



South Warwickshire *Together*

Joint Cabinet/Executive Committee

Notice of Meeting

Wednesday 7 December 2022

4.00 p.m.

**The Town Hall
The Parade
Leamington Spa
Warwickshire
CV32 4AT**

Members of the Committee are requested to attend

Chairman: To be appointed at each meeting

Councillors:

Stratford-on-Avon

Warwick

A Parry

J Cooke

D Pemberton

A Day

I Shenton

R Hales

Observers:

Chairman of Stratford-on-Avon District Council Overview and Scrutiny Committee

Councillor Crump

Chairman of Warwick District Council Overview and Scrutiny Committee

Councillor Milton

Leader of Stratford-on-Avon District Council Liberal Democrat Group

Councillor Juned

Warwick District Council Liberal Democrat Group

Councillor Boad

Warwick District Council Labour Group

Councillor Mangat

Warwick District Council Green Group

Councillor Davison

JOINT CABINET/EXECUTIVE COMMITTEE

7 December 2022

AGENDA

1. Appointment of Chairman

To appoint a Chairman for each meeting from the members of the Council that is hosting the meeting.

2. Apologies for Absence

3. Disclosures of Interest

Members to declare the existence and nature of interests in items on the agenda in accordance with the adopted Code of Conduct.

Declarations should be disclosed during this item. However, the existence and nature of any interest that subsequently becomes apparent during the course of the meeting must be disclosed immediately. If the interest is not registered, Members must notify the Monitoring Officer of the interest within 28 days.

Members are also reminded of the need to declare predetermination on any matter.

If Members are unsure about whether or not they have an interest, or about its nature, they are strongly advised to seek advice from officers prior to the meeting.

4. Minutes of Previous Meetings (Pages 1 - 22)

To confirm and sign the Minutes of the meetings held on 14 April 2021, 10 March and 29 June 2022.

5. South Warwickshire Local Plan Part 1 - Issues and Options Consultation (Pages 23 - 38)

To consider agreement of the South Warwickshire Local Plan Issues and Option document (attached at Appendix 5) for consultation commencing in January 2023.

6. Urgent Business

To consider any business which, in the opinion of the Chairman, is urgent in accordance with the provisions of Section 100B (4) of the Local Government Act 1972.

CHIEF EXECUTIVES
Stratford-on Avon and Warwick District Councils

David Buckland
Chief Executive
(Head of Paid Service)
Stratford-on-Avon District Council
Elizabeth House, Church Street
Stratford-upon-Avon
CV37 6HX

Chris Elliott
Chief Executive
(Head of Paid Service)
Warwick District Council
Milverton Hill
Royal Leamington Spa
CV32 5HZ

General Enquiries: Please contact either:

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Royal Leamington Spa CV32 5HZ
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For enquiries about specific reports, please contact the officers named in the reports

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JOINT CABINET/EXECUTIVE COMMITTEE

14 April 2021

MINUTES

*Held via MS Teams - Virtual Teams Meeting
Meeting commenced: 4.00 p.m. Meeting ended: 4.50 p.m.*

Present: Councillor A Day (Chairman) Councillors J Cooke, A Day, R Hales, M Jennings, D Pemberton and I Shenton

Apologies: Councillor A Parry (Councillor I Shenton substitute)

Also in attendance as Observers: Councillor A Boad (Warwick Liberal Democrat Group)
Councillor I Davison (Warwick Green Group)
Councillor M Mangat (Warwick Labour Group)
Councillor A Milton (Chairman of WDC Overview and Scrutiny Committee)
Councillor Juned (Stratford-on-Avon Liberal Democrat Group)
Councillor P-A O'Donnell (Chairman SDC Overview and Scrutiny Committee)

1. Appointment of Chairman

Nominations were invited for the appointment of Chairman of the Joint/Cabinet Executive Committee.

There being only one nomination, it was proposed by Councillor Pemberton, seconded by Councillor Jennings and

RESOLVED:

That Councillor Day be appointed as Chairman for the meeting.

2. Disclosures of Interest

There were no declarations of interest made.

3. South Warwickshire Local Plan - Scoping Report

Councillor Pemberton – Place Portfolio (Stratford-on-Avon District Council) and Councillor Cooke – Development Portfolio (Warwick District Council)

The Committee considered a report that outlined the work that had been carried out, to date, by both Councils to prepare a Local Plan for South Warwickshire and which sought agreement to undertake a Scoping and Call for Sites consultation.

In July 2020, Stratford-on-Avon District Council's (SDC) Cabinet and Warwick District Council's (WDC) Executive agreed a joint statement that had been prepared by the Leaders of the two Councils. This included the statement:

"that agreement be given, in principle, to conducting a Joint Core Strategy/Local Plan Review and that a further paper be presented setting out details of a proposed programme, a member and officer governance".

Subsequently, in October 2020 the Councils both approved a paper prepared by officers, in consultation with Councillor Pemberton, the Portfolio Holder for Place

(SDC) and Councillor Cooke, the Portfolio Holder for Development (WDC), which confirmed the agreement to prepare a single Local Plan for South Warwickshire, that would replace both the SDC Core Strategy and WDC Local Plan. These reports supported the principle of establishing a Joint Committee of Councillors from both Councils to consider and agree key reports relating to the Local Plan. The reports also agreed the establishment of a Joint Member Advisory Group.

A further report, approved by both Councils in February 2021, agreed the establishment of this Joint Committee.

Since October 2020, officers and Councillors had been working together to commence work on the new Local Plan. It had been agreed that the document would be called the South Warwickshire Local Plan (SWLP). To date, the work on the SWLP had three main elements: (1) early technical work undertaken by officers in consultation with Portfolio Holders, (2) engagement with the Member Advisory Group and (3) early stakeholder engagement. This had culminated in the document attached as Appendix 1 to the agenda report.

There was potentially two options available to the Joint Committee. The first to amend the scoping document before consulting in due course. The second option was for the Joint Committee not to undertake a public consultation on the scoping document.

In respect of the first option, Members were reminded that the scoping document was simply the first stage in a process and did not make any decisions itself. It was a discussion document about how the Councils could best meet the development challenges facing South Warwickshire to 2050. It made some suggestions in order to elicit responses. As the document itself stressed, further detailed technical work needed to be undertaken to assess the suitability and/or appropriateness of any locations for future development. This consultation would help focus where and how to move forward.

In respect of the second option, such an approach was not supported. Early engagement with the public and key stakeholders was important to help local communities understand the Local Plan process and to help inform both Councils as they made key decisions on the strategy and policies of the Local Plan at a later stage. Early engagement with surrounding planning authorities was also important to underpin the Councils' duty to cooperate requirements.

Following which, it was

RESOLVED:

- 1) That the work carried out to date on commencing preparation of the South Warwickshire Local Plan, be noted;
- 2) That the consultation document "South Warwickshire Local Plan: Stage 1: Scoping and Call for Sites Consultation", attached as Appendix 1 to the agenda report, be approved for consultation with the public and stakeholders; and
- 3) That the two lead officers, in consultation with the Portfolio Holders for Place (Stratford-on-Avon District Council) and Development (Warwick District Council), be authorised to make any final editorial amendments to the Scoping Document prior to consultation.

4. Urgent Business

There were no items of urgent business.

CHAIRMAN

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JOINT CABINET/EXECUTIVE COMMITTEE

10 March 2022

MINUTES

*Held at The Town Hall - Leamington Spa - The Town Hall - Leamington Spa
Meeting commenced: 4.15 p.m. Meeting ended: 5.00 p.m.*

Present: Councillors A Day (in the Chair), M Jennings, D Pemberton, J Cooke, R Hales and T Harvey (substitute for A Parry)

Apologies: Councillor Milton and A Parry

Also in attendance as Observers Councillor Boad (Warwick Liberal Democrat Group Observer)
Councillor Davison (Warwick Green Group Observer)
Councillor Juned (Stratford-on-Avon Liberal Democrat Group Observer)
Councillor Mangat (Warwick Labour Group Observer)
Councillor O'Donnell (Chairman of the SDC Overview & Scrutiny Committee)

5. Appointment of Chairman

Nominations were invited for the appointment of Chairman of the Joint/Cabinet Executive Committee.

There being only one nomination, it was proposed by Councillor Cooke, seconded by Councillor Pemberton and

RESOLVED:

That Councillor Day be appointed as Chairman for the meeting.

6. Disclosures of Interest

There were no declarations of interest made.

7. South Warwickshire Local Plan - Evidence Report

*Councillor Pemberton – Place Portfolio (Stratford-on-Avon District Council) and
Councillor Cooke – Development Portfolio (Warwick District Council)*

The Committee considered a report that updated Members on the various technical studies being prepared as part of the local plan evidence base to inform the preparation of the South Warwickshire Local Plan (SWLP). In particular, it sought endorsement of the Housing and Employment Land Availability Assessment (HELAA) methodology.

The National Planning Policy Framework (NPPF) required Local Plans were underpinned by relevant and up-to-date evidence. These needed to be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and took into account relevant market signals.

The Scoping and Call for Sites consultation put forward suggestions as to what new evidence would be required to inform the SWLP, and question four of the consultation sought views on this. Analysis one of the responses to this and ongoing discussions with stakeholders was informing the identified evidence

base required for the next stage of the Plan – the Issues and Options consultation. Some of this evidence was being collected by partners and would form part of the discussions with the stakeholder meetings in the next few weeks.

The Scoping document also identified a range of key plans and strategies that would be taken into account. A number of respondents cited other documents that needed to be used to inform the SWLP. Other more recently published strategies would also need to be taken into account, including the Levelling Up White Paper as the SWLP would be a critical document in delivering on these missions and ambitions, and securing finance from the UK Shared Prosperity Fund.

Another aspect of the preparation of the Plan was ongoing engagement with the Councils' key stakeholders. To inform the next stage of the Plan, the Issues and Options, meetings were set up with a range of organisations in order to progress any issues raised in their scoping consultation response, and to develop the growth strategy and necessary infrastructure requirements, along with the possible policy options.

A number of pieces of evidence were in the process of being prepared in-house or commissioned externally by consultants. Appendix 1 to the report set out the current position with regards to preparing the evidence base, and identified which initial evidence was expected to inform the Issues and Options, and which would be produced at a later date to inform the Preferred Options version of the Plan.

The climate change evidence, which was in the process of being commissioned, was highlighted as particularly significant. This evidence was required to address ten aspects in relation to climate change as follows and which would need to be refined as the plan progressed:

1. Set the context for climate change in relation to the South Warwickshire area using an analysis of the relevant existing available information, including a technical assessment of current and predicted changes;
2. Inform the growth strategy of the Plan by assessing the impacts of a variety of options and potential strategic allocations in relation to impacts on carbon emissions and impact on flooding and biodiversity and ability/opportunities for suitable mitigation and adaptation including the effect of higher temperatures;
3. Identify sites or broad locations within South Warwickshire where it would be appropriate to locate renewable and decentralised energy sources, including serving site allocations and existing built-up areas. This might include the establishment of a criteria-based assessment upon which a Local Plan policy could be derived;
4. An assessment on what 'net zero carbon' means and looks like for new development in South Warwickshire, including embodied carbon, both in relation to residential and non-residential uses through a technical feasibility. Consideration of how the design and layout of schemes could embrace not only net zero carbon but also address other climate change mitigation and adaptation elements such as biodiversity, flooding, overheating, resilience to increased temperatures, accessibility – building on concepts such as the 20-minute neighborhood and how this could be applied to the South Warwickshire area. This would help inform the establishment of specific criteria-based climate change policies within the Plan that new development would be required to satisfy;

5. Consideration of how the Plan could address retrofitting existing buildings to minimise carbon emissions and enable buildings to adapt to climatic changes, particularly given the local character and distinctiveness of many settlements within South Warwickshire. This should link to the point above in relation to decentralised energy sources;
6. Climate Change impact assessment of policies within the Plan, including those not directly related to climate change, to understand any potential positive and negative implications;
7. Viability implications of both the preferred growth strategy and specific policies within the Plan related to Climate Change mitigation and adaptation. This should include an assessment of the whole life costs. It was anticipated that the Plan would be aimed at carbon zero developments, as this was beyond the Future Home Standard evidence that was required to demonstrate if/how this could be achieved, and if not then what the Council's carbon reduction targets should be;
8. Carbon Sequestration – The extent to which the Local Plan could assist in this process;
9. Offsetting evidence to inform a policy in the Local Plan on climate change offsetting, in terms of process, type of development eligible, cost and how it could be spent; and
10. In recognition of the multiple pressures on rural land (such as renewable energy, local food production, biodiversity, tree planting etc), consideration of whether there were existing land typologies that could be protected and/or allocation to minimise carbon emissions.

Members were reminded that the potential need to undertake a Green Belt review was highlighted in the Scoping consultation. It was proposed that such a review should be carried out following the Issues and Options stage. This would conform to national policy in terms of needing to demonstrate exceptional circumstances before a review was undertaken and the Issues and Options consultation could be used to frame the conversation with residents and stakeholders about the merits and challenges of undertaking a Green Belt review, particularly in relation to addressing the climate change emergency.

It would also enable further engagement with the Council's duty to co-operate with partners, particularly surrounding local authorities about the potential for other authorities to meet the needs and the level of support for a sub-regional approach.

Regarding the Housing and Employment Land Availability Assessment (HELAA), a standard approach to the assessment of housing and employment sites was being applied across Coventry and Warwickshire and a public consultation in respect of this methodology concluded in December 2021. This sub-regional HELAA methodology set out a high-level framework for assessing potential locations/directions for growth, within which individual Local Planning Authorities could tailor specific criteria to respond to their local circumstances. The HELAA replaced existing SDC and WDC Strategic Housing Land Availability Assessments or SHLAAs.

The methodology applied the standard 'traffic light' (red, amber, green) colour coding to indicate how a location might perform against each of the criteria:

- Red – locations might be considered unsuitable. The constraint was absolute and could not be mitigated;
- Amber – a constraint to development existed, but mitigation might be possible; and
- Green – the location was not constrained by this criterion.

For some criteria a 'red' assessment would be sufficient to remove the site from the process as unsuitable. In others, it was possible that a more nuanced assessment might be necessary where a location/site might on balance had the potential to achieve other objectives through development.

The sub-regional methodology outlined the types of locations and sites which might be identified for assessment. This included, but was not restricted to, the sites identified in the Call for Sites exercise. Other locations/directions/sites would be compiled by officers in due course for assessment, in line with the sub-regional approach. This could include for example current allocations which did not presently benefit from planning permission, unimplemented planning permissions, previously withdrawn or refused planning applications, and sites from the Brownfield Registers.

It was important to note that any assessment of whether a location/site could be appropriate, was distinct from whether it should be developed, which was linked to the spatial strategy. Work on defining the spatial strategy options would run concurrently (though discretely) from the application of the HELAA methodology. It did not therefore automatically follow, that sites that could be appropriate for development would be allocated for such.

A multi-layered approach was being applied to the SWLP; within the HELAA itself, under the assessment of suitability, site/location attributes were being considered first before policy designations and site constraints were applied – see Appendix 2 to the report. The availability of sites and their achievability for development were also assessed to reach a conclusion about the overall deliverability of sites/locations.

An additional assessment outside the scope of the sub-regional HELAA based on the SWLP Scoping and Call for Sites consultation was then being applied.

Regarding HELAA Suitability Assessment: Location/site attributes, this stage was focused on quickly sifting out obviously unsuitable sites, both in the 'call for sites' submissions and other types of sites which might be identified from the sub-regional methodology (e.g., previously withdrawn or refused planning applications). This was based on site size, location and in the case of 'call for sites' submissions, the proposed purpose of the site. All sites assessed as 'red' in one or more of the criteria in this sub-section would be removed from the assessment process at this stage.

The HELAA Suitability Assessment Policy designations and site constraints principally using a desk-based assessment (i.e., GIS mapped data) would identify whether a location/site was subject to any known policy or physical constraints. This would identify whether the site fell within or was adjacent to any policy designations (such as the Green Belt or the AONB), and whether it had any relevant ecological, land, or heritage constraints that would need to be considered.

The HELAA Availability and Achievability Assessment would confirm that the site was available for development at a given point in time and that there were no other legal or market impediments to delivery.

Additional Assessment based on the four overarching principles set out in the SWLP Scoping and Call for Sites consultation, additional settlement design and infrastructure mapping criteria were developed. This work included, for example:

- access and connection opportunities including barriers to connectivity;
- landform;
- accessibility to public transport services;
- accessibility to infrastructure such as schools, shops, and health services; and
- accessibility to public open spaces.

In respect of recommendation two, two options were available; to endorse the methodology as presented or to amend the methodology. Not endorsing a methodology was not considered an option as officers required some objective means of selecting potential locations for inclusion within the next Issues and Options consultation.

The Group Observers supported the recommendations in the report, stating that the “direction of travel” was excellent. However, Councillor Juned requested an update on how national government plans might affect the powers available to the Council.

Following which, it was

RESOLVED:

- 1) That the various technical studies underway be noted, the results of which used to inform the preparation of the South Warwickshire Local Plan; and
- 2) That the Housing and Employment Land Availability Assessment methodology be endorsed.

8. South Warwickshire Local Plan - Update Report

Councillor Pemberton – Place Portfolio (Stratford-on-Avon District Council) and Councillor Cooke – Development Portfolio (Warwick District Council)

The Committee considered a report that updated Members on the progress of the South Warwickshire Local Plan and to agree its scope and end date. Stratford-on-Avon (SDC) and Warwick (WDC) District Councils consulted on the South Warwickshire Local Plan (SWLP) Scoping and Call for Sites document between 10 May and 21 June 2021. Four ‘golden threads’ ran throughout the plan:

- Tackling climate change;
- Increasing connectivity;
- Increasing biodiversity; and
- Promoting wellbeing.

In the same way as infrastructure, the economy was not a ‘golden thread’ in itself but cut across all four components. As such, the Plan was also seen as a key delivery mechanism for the various corporate strategies including climate change and the emerging joint South Warwickshire Economic Strategy.

The consultation sought responses to 53 specific questions covering range of topics and structured across four chapters:

- Questions 1-6 about the scope of the plan and the call for sites;
- Questions 7-38 about key strategic planning issues;

- Questions 39-41 about the vision and strategic objectives; and
- Questions 42-53 about various options for growth.

561 individuals/organisations responded to the consultation and 557 sites were submitted as part of the Call for Sites. A Consultation Statement setting out the consultation approach and a summary of the consultation responses received was available in Appendix 1 to the report. Social media for the consultation attracted some 84,500 impressions and the accompanying videos were watched over 2,500 times. Officers also undertook a feedback survey of those who responded to learn lessons from the consultation.

The results of the call for sites exercise were available to view via interactive mapping software at South Warwickshire Local Plan. It was stressed that the call for sites was simply a long list of the sites that had been submitted to Stratford-on-Avon and Warwick District Councils for consideration through the South Warwickshire Local Plan process. Publication of the Call for Sites was in no way an endorsement by either Council that the site was suitable for development or would be included within the Local Plan itself. These sites had not yet been analysed and as such it was unlikely that all sites would be taken forward as the plan progressed. The decision to publish the call for sites in their 'raw' form was one of transparency. The methodology that the Councils were applying to assess locations and sites was set out in a separate agenda item in respect of the evidence base update.

Section 3.3 of the report and question three in the Scoping and Call for Sites report sought responses on the plan period i.e., the length of time that the policies in the Local Plan should be valid for. Paragraph 22 of the NPPF (July 2021) stated that:

"Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."

By planning over a longer time period, the Councils would be able to align more easily with infrastructure providers who typically take a longer-term view on investment decisions. This would help ensure that new developments were supported by the necessary improvements in infrastructure. 2050 was also the date of the Government's goal to achieve a 100% reduction in net greenhouse gas emissions (relative to 1990 levels). There were 235 respondents to this question. In total there were 127 respondents supporting the proposed end date, 71 objecting and 37 did not provide conclusive answers either way.

Of those supporting the proposed 2050 end date the majority agreed that this would provide an opportunity to consider strategic growth options and to plan more sustainably. A longer plan period would allow the delivery of significant developments, and even new settlements, in full, which would help meet the needs of both districts and the unmet need across the Housing Market Area. A longer plan period would also help in bringing forward the necessary infrastructure, as well as provide certainty to local communities and developers.

Respondents also commented on the importance of a longer plan period when a review of the Green Belt was considered. Any changes to the Green Belt boundary would need to endure well into the future, and to prevent piecemeal

release in the future, a realistic understanding of future development was required. It was also commonly acknowledged that 2050 aligned with the national targets to be carbon neutral.

The arguments against the proposed end date were largely centred around the uncertainty of the future and the pace at which society and technology could change, as shown by the recent pandemic. As such, it was believed the Plan would become out of date too quickly. There were also concerns that a long-term Plan would not meet short term requirements, and there was a strong feeling that quicker action needs to be taken to combat climate change.

Another strong argument against the proposed end date, was that both existing Plans were being 'replaced' four to five years after they were adopted, despite still having approximately ten years left of the Plan period. There was therefore concern as to how a new Plan, with an even longer Plan period could remain relevant, when the existing ones were being replaced so soon after adoption.

With regards to the 38 respondents who did not provide conclusive answers either in support or against the proposed end date, most believed 2050 should be the absolute minimum end date, and it should in fact extend beyond this date. There were also comments relating to the rigidity of the Plan, and how it would be important to ensure adequate review mechanisms to make sure the Councils were not 'stuck' with an out-of-date plan based on out-of-date evidence.

Regarding the scope of the plan, Section 3.2 of the report and question two in the document sought responses on the scope of the plan. It suggested that rather than prepare a single comprehensive Plan, the plan-making process should be split into at least two separate parts.

Part One would establish a robust and flexible framework setting out where and how much development should take place across South Warwickshire. It would include the core principles and strategic policies that could provide the context for more detailed policies to follow. This framework should be capable of remaining relevant for the duration of the Plan period. This split approach would enable the Councils to prepare the first part of the Local Plan much more quickly. This would provide clarity and certainty to communities and landowners.

It would also ensure that the Councils could continue to proactively manage development pressures facing South Warwickshire. Essentially, Part One established the framework for subsequent parts of the SWLP to come forward. It could also provide a meaningful role for neighbourhood plans to focus on detailed local policies within the context of the strategic planning framework established by Part One.

No decisions had yet been made about how to progress subsequent plans although this approach provided flexibility to adopt the most appropriate solution. It might be that a hybrid approach was most appropriate reflecting the geography and challenges facing South Warwickshire.

The practical effect of having a Part One Plan was an acceptance that Part One would not identify or include every development site; it would only identify strategic sites and locations. Non-strategic sites would be identified in subsequent parts of the Plan. There was a further discussion to be had as to what the detail of this approach would look like.

The most important component of Part One was the development strategy – also known as the spatial strategy; the name given to the approach set out in policy as to how the Plan apportions growth to the area. It identified a hierarchy of settlements based on the principles of sustainable development where the more sustainable locations, at the top of the hierarchy, received more growth. The hierarchy could include existing settlements, locations/key sites as well as new settlements. Typically, housing and job numbers were apportioned to these locations. Essentially, the development strategy set out how much development went where.

The current development strategies were set out in Policies CS.15 and CS.16 of the SDC Core Strategy and Policies DS4, DS6, DS7 and DS8 of the Warwick Local Plan. They related to both housing and employment. The WDC Local Plan met its housing requirement in full by allocating sites of a variety of sizes. The SDC Core Strategy also met its housing requirement in full albeit by allocating a more limited number of larger sites, strategic and non-strategic in nature. Both plans fully met their jobs requirement by allocating sufficient employment sites.

The term 'strategic sites' was not defined as such but was regarded as being sites central to the delivery of the plan. As such, strategic sites should not be defined by size alone, although this could be a useful proxy. The NPPF set out guidance in respect of the approach to strategic policies (not sites per se) – see excerpt in Appendix Two to the report.

The most important aspect of the Plan was to demonstrate deliverability. As such, strategic sites could encompass locations where significant change or substantial growth was proposed or where development was required in the early years of the Plan period necessary to maintain a five-year housing land supply. For the avoidance of doubt, the Part One plan would need to identify any areas for Green Belt release, including any areas of new Green Belt.

It should have been noted that local planning authorities were required to assess the up-to-dateness of their Plan every five years, and review Plans if necessary. This requirement fitted well with the framework set in a Part One Plan, thus enabling the detailed policies in subsequent Plans to be updated and remain relevant to 2050. In other words, Part One were fixed now for the period to 2050 and subsequent parts of the Plan were prepared and reviewed on a more regular basis as necessary over the 25-year period e.g., to take into account changes in technology and standards.

The housing 'to-find' figure needing to be met by allocations in the Core Strategy was significantly reduced owing to applications being granted consent or via appeal. The Site Allocations Plan sought to identify additional housing sites beyond the housing requirement as well as reserve housing sites.

There were 230 respondents to this question. In total there were 151 respondents supporting the approach of a strategic Part One Plan, 43 objecting and 36 did not provide conclusive answers either way.

The two primary arguments in support of a strategic Part One Plan, was that it would expedite the Plan making process, in turn providing clarity and certainty for developers and communities, and that it would allow the Councils to focus on the strategic priorities of the area.

There was also an understanding that having a high-level Plan allowed a level of flexibility in the plan making process should there be any drastic changes or reforms.

Interestingly, many of the arguments against a Two-Part Plan were direct opposites of the arguments above. Many respondents believe that a Two-Part Plan would cause confusion and uncertainty, particularly for smaller villages who would need to wait for the Part Two Plan to come forward before they understood the full extent of development across the District. However, the most prolific argument against a Two-Part Plan, was the time taken for the second Plan to come forward. Many respondents believed that a Two-Part Plan would take too long to be adopted and there were concerns that this might cause shortfalls in the five-Year Housing Land Supply which might result in unplanned development. Many respondents pointed to the difficulties Stratford-on-Avon District Council had with the Site Allocations Plan. The view of these respondents was that a 'full' plan should be progressed.

For those that did not provide conclusive answers they shared many of the views presented above. Most understood the sentiment behind the high-level strategic Part One Plan, but they also had some concerns. For some, it was unclear what the Part One Plan would contain, and what 'strategic matters' it would cover, and whether a Part 1 Plan might lack the necessary detail; greater clarity over its contents were requested. Many respondents suggested that the Part One Plan would need to cover strategic allocations and have a conclusive development strategy. For those that were concerned about the timescales, it was commonly stated that Part Two would need to come forward in a timely manner so that the detailed matters were not delayed.

Overall, the vast majority of respondents understood and agreed with the approach of a Two-Part Plan. In conclusion, a Part One plan that established the strategic principles for development over the long term provided flexibility in respect of how we then plan the details. Some of those details would be included in Part One (i.e. strategic locations and any Green Belt locations), some would be incorporated in subsequent South Warwickshire Local Plans, whilst some details could be included within neighbourhood plans.

Importantly, commencement of any work on subsequent SWLP documents would not have to wait until adoption of Part One but could be brought forward in close succession.

In terms of alternative options, there were two substantive recommendations in this report. In respect of recommendation two, an end date was required. A date of 2050 was proposed for the reasons set out in the report. If Members did not agree that 2050 was the appropriate date, then an alternative date needed to be established.

In respect of recommendation three, if Members did not agree that with the proposed approach of having a strategic Part One Plan, then the alternative was for a single comprehensive SWLP to be produced. Members should be aware of the likely impact on plan-preparation timescales of such an approach.

In response to questions from Group Observers, the Head of Place and Economy explained that the benefit of Part One Planning was flexibility, although what that would look like had not yet been decided. He stated that a more flexible approach enabled the Councils to adapt to changing government policy. Each plan had its own statutory processes to go through, and the Councils aimed to create a high-level and robust framework that enabled the details to be changed as and when.

Following which, it was:

RESOLVED:

- 1) That the summary of the feedback that had been received in response to the Scoping and Call for Sites consultation during May/June, be noted;
- 2) That the end date of the South Warwickshire Local Plan be 2050; and
- 3) That the South Warwickshire Local Plan be prepared as a suite of plans, with Part 1 to the report being a strategic plan establishing the development strategy and strategic policies, be agreed.

9. South Warwickshire Local Plan - Timetable Report

Councillor Pemberton – Place Portfolio (Stratford-on-Avon District Council) and Councillor Cooke – Development Portfolio (Warwick District Council)

The Committee considered a report that sought to agree the timetable for the preparation of the South Warwickshire Local Plan.

There were a number of stages to the preparation of Local Plan documents (see Figure 1 below). Publishing a timetable setting out when these various stages were likely to occur helped to ensure that residents and stakeholders could more fully engage in the process.

An indicative timetable for the South Warwickshire Local Plan (SWLP) was published in Autumn 2020 with the intention that it would be confirmed following the initial Scoping and Call for Sites Consultation held between May and June 2021.

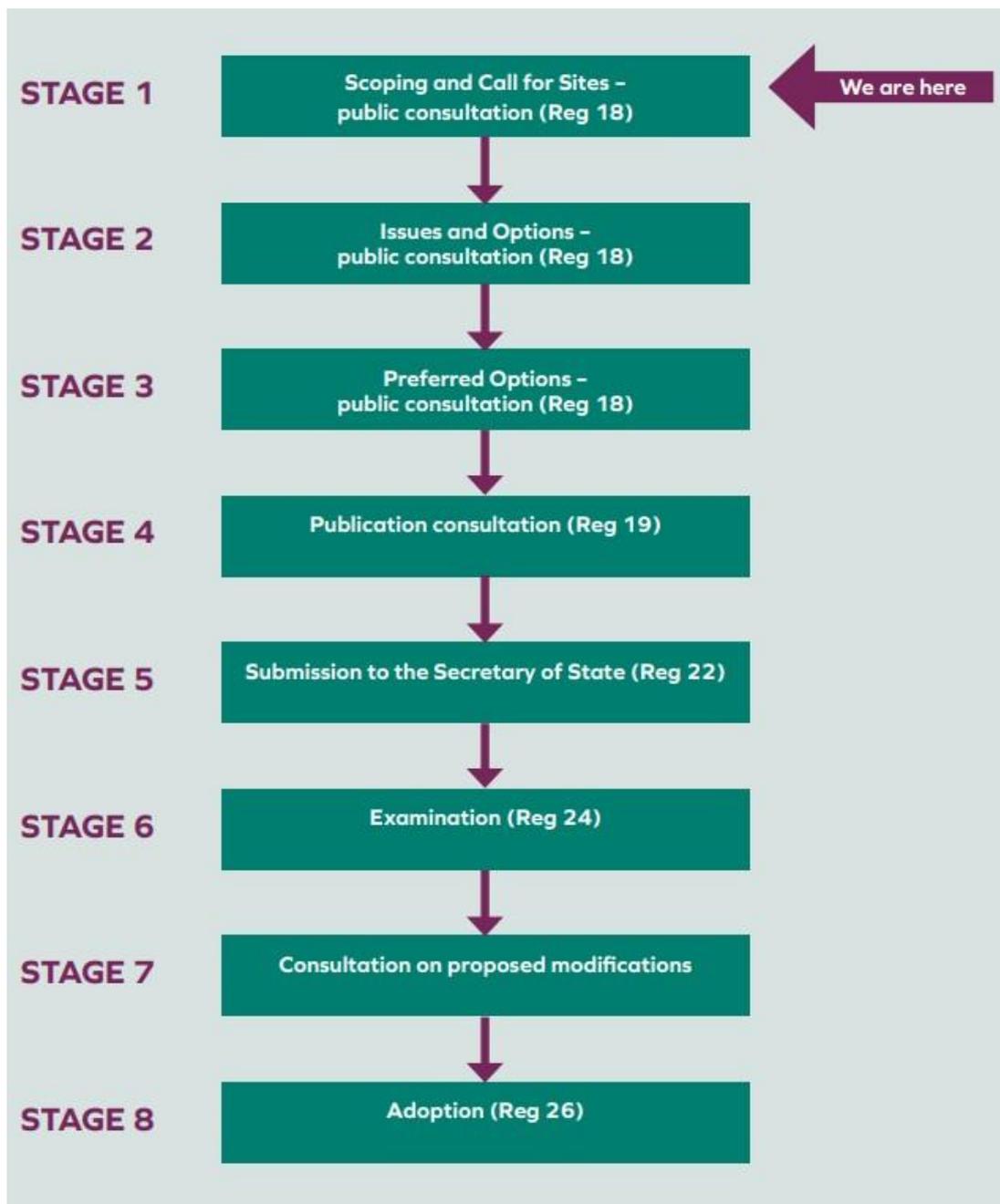
The intention was to consult on the next stage of the SWLP – Issues and Options – in late summer 2022. As such, it was considered necessary to confirm these timescales.

It was also a legal requirement to prepare a Local Plan in accordance with the published Local Development Scheme (LDS). The LDS was a work programme that provided information about the Local Plan/Development Plan Documents (DPDs) that a Local Planning Authority would produce. The LDS set out the subject and geographical area that each DPD would cover and the timetable for its preparation and revision. SDC and WDC's current LDSs did not include an up-to-date timetable for the SWLP.

The report sought to agree the SWLP timetable so that it could then be included within each Council's LDS in due course. The timetable is attached at Appendix 1 to the report.

It should have been noted that the timetable would be kept under review and could be adjusted as necessary. It was considered challenging but realistic and provided for a degree of flexibility. One key variable related to the 2023 local elections which might be postponed to 2024 if the Government confirmed the political merger of the two Councils.

Figure 1 – Stages of Local Plan Preparation



Whilst much of the work on the SWLP could be undertaken in parallel, certain aspects of plan preparation were sequential. Given the importance of housing and job numbers, it was considered sensible to await the publication of the 2021 Census results before consulting on the Issues and Options version of the SWLP. The headline results were due Spring 2022. Delay to publication might impact on the proposed timetable. The alternative would be to consult using current projections which were based on figures that were now 10 years old. The Census would also provide an opportunity to verify the accuracy of these projections.

It should also be noted that the timetable, post submission of any plan was determined by the Planning Inspectorate.

In terms of alternative options, there were two options available to the Joint Cabinet Committee. The first was to agree the timetable as drafted, noting that it could be kept under review and adjusted as necessary. The second option was to agree an alternative timetable. Not confirming a timetable was not considered to be a realistic option.

In response to comments from Group Observers, the Head of Place and Economy explained that, as this was a high-level plan, it was advisable to adopt this timetable. He assured Members that a more detailed timetable would be circulated in due course to allow Members to provide better and more timely scrutiny.

Following which, it was

RESOLVED:

That the timetable for the preparation of the South Warwickshire Local Plan be agreed and incorporated into each Council's respective Local Development Scheme in due course.

10. Urgent Business

There were no urgent business items.

CHAIRMAN

JOINT CABINET/EXECUTIVE COMMITTEE

29 June 2022

MINUTES

*Held at The Town Hall - Leamington Spa - The Town Hall - Leamington Spa
Meeting commenced: 6.10 p.m. Meeting ended: 7.12 p.m.*

Present: Councillor A Day (Chairman) Councillors A Parry, D Pemberton, J Cooke and R Hales

Apologies: Councillor M Mangat

Also in attendance: Councillor A Milton (Chair of Warwick District Overview & Scrutiny Committee)
as Councillor A Boad (Warwick District Liberal Democrat Group Observer)
Observers: Councillor J Falp (Whitnash Residents' Association Group)

11. Appointment of Chairman

Nominations were invited for the appointment of Chairman of the Joint/Cabinet Executive Committee.

There being only one nomination, it was proposed by Councillor Cooke, seconded by Councillor Pemberton and

RESOLVED:

That Councillor Day be appointed as Chairman for the meeting.

12. Disclosures of Interest

There were no declarations of interest received.

13. South Warwickshire Local Plan - Settlement Analysis Evidence Report

Councillor Pemberton – Place Portfolio (Stratford-on-Avon District Council) and Councillor Cooke – Development Portfolio (Warwick District Council)

The Committee considered a report which sought endorsement of the Settlement Analysis Evidence Report which was prepared as part of the local plan evidence base to inform the preparation of the South Warwickshire Local Plan.

Settlements were identified for assessment on the basis that they fell within the first or second tier settlements in either the Stratford-on-Avon District Core Strategy (Main Town and Main Rural Centres) or the Warwick District Local Plan (Urban Areas and Growth Villages) and were relevant to more than one of the growth scenarios set out in the Scoping and Call for Sites consultation. This approach enabled officers to focus on settlements already considered amongst the most sustainable in planning policy. In addition, a number of other settlements were identified for assessment on the basis that they were relevant to the rail corridor or socio-economic growth scenarios. In analysing feedback from the scoping consultation, the 'rail corridor' option was the option most cited as the preferred scenario (21%), with the fewest citing it as the least

preferred (5%), and this contributed to the decision to focus on settlements within rail corridors. Whilst all of the other options (with the exception of 'dispersed', which was stated as the least preferred option by 36% of respondents) had reasonably balanced responses in terms of 'most preferred' and 'least preferred' options, officers identified the socio-economic option for further analysis.

Kineton was selected due to its existing policy status, relative size and infrastructure provision, and South of Coventry because the city edge also forms a potentially sustainable location. There was potential for additional settlements to be assessed using the methodology set out in the report if the spatial strategy evolved to necessitate it.

For the purposes of this study, only settlements within the Cotswold Area of Outstanding Natural Beauty (AONB) were excluded from selection, all other settlements including those within the Green Belt were not excluded from assessment as it was considered important for the study to take a 'policy-off' approach at this stage in order to have the most use in informing future decision-making on growth options.

The evidence covered three main elements which were: connectivity evidence and analysis; accessibility evidence and analysis; and density mapping.

The methodology for the connectivity evidence and analysis element of the study was designed to consider the existing settlement structure, and the opportunities and constraints this might afford, to create growth which was well connected to the established town or village.

The Settlement Structure Analysis considered each settlement as it currently existed including a review of historic maps to get an impression of how the settlement had evolved over time, existing green and blue corridors, and railway lines along with route structure analysis using a colour coded approach to categorise different types of routes and help to establish how permeable and connected the street network was:

- Strategic long-distance highways;
- Primary streets;
- Thoroughfares;
- Loops;
- Cul de sacs;
- Cycle only routes;
- Bridleways; and
- Footpath connections.

Using a combination of desk-based GIS analysis and site visits, the following key landform information was recorded for each of the settlements assessed:

- Notable gradients in and around the settlements;
- Areas at risk of flooding; and
- Significant areas of Green Infrastructure.

Based on the analysis undertaken for parts above, further analysis of the relative connectivity of the 'edges' of each settlement was analysed and graded by dividing the settlement into edge segments and assessing each edge against a range of factors to identify a 'Connectivity Grade' between A (best connectivity) and E (poorest connectivity) which were colour coded between green (A) and red (E) on the maps. It enabled the comparison of different

directions for potential growth around settlements, in terms of their ability to connect into the established 'structure' of the settlement, and the opportunities and constraints in this respect.

It was acknowledged that other constraints beyond the scope of this study might also impact on whether growth may or may not be appropriate in different directions from existing settlements (e.g. ecological or heritage designations, or infrastructure capacity) and this evidence was also gathered and layered up to provide a comprehensive picture.

The methodology was designed to identify those local services that were necessary to meet the day-to-day needs of residents within a 10-minute walk (800m).

The types of services necessary to meet day-to-day needs were identified for each of the settlements and broken down into a number of typologies:

- Retail, jobs and economy;
- Places to meet;
- Open space, leisure and recreation;
- Healthcare; and
- Education.

Having identified the location of existing services and facilities within the settlements, the next step explored the extent of the area which was likely to fall within a 10-minute walk (800m) of each of the five categories of services as set out above. From this, it was possible to identify how many of the categories were within a 10-minute walk of each of the edge segments identified in the connectivity analysis. This helped to inform how accessible any growth in this location would potentially be. It was acknowledged that this analysis was focussed on existing infrastructure and did not take account of whether the quality/capacity of the infrastructure or the scope for new infrastructure to be provided as part of any new development. These aspects would need to be considered separately.

The appropriate density of new development needed to take into account a range of factors including the surrounding context and accessibility, along with the proposed building form and character of a particular site. More compact forms of development in certain locations could bring people together to support local services and make destinations easily accessible by walking or cycling thus reducing dependency upon the private car. Density considerations also had an important role to play in tackling climate change both in relation to reducing carbon emissions and in adaptation and mitigation.

This element of the settlement analysis mapped the different density ranges within the existing settlements using a coding structure recommended by the National Model Design Code. This information would help guide assumptions in respect of appropriate densities of any new growth and identify potential capacity to inform the extent to which the various growth options would be able to deliver the necessary development need.

In terms of options, the two available options were to endorse the Settlement Analysis evidence report as presented or to amend the methodology. Not endorsing the evidence report was not considered an option as officers required some objective means of assessing existing settlements in order to assist in identifying potential locations for inclusion within the next Issues and Options consultation.

Warwick District Council Overview & Scrutiny Committee had considered the report and had provided the following comments. It was keen that Warwick District Council stayed close to housing demand numbers and interrogated them when they were published along with the requirements for infrastructure within the areas; wished to know when the budget shortfall would be addressed; and requested that information should be added to the report up front to provide clarity on:

- a) how the greenbelt is impacted (or not) by this report and when that will be addressed;
- b) the definition of a twenty-minute neighbourhood, with examples provided, for people to better understand the concept;
- c) densities and the impact these might have on future issues and options; and
- d) the distinction/difference between the Scoping and Call for Sites consultation results and the analysis done in this report and at what stage the results from both would come together.

The Warwick District Council Overview & Scrutiny Committee also recommended to the Joint Cabinet Committee that the District Councils should engage with Town and Parish Councils earlier in the process to validate the findings for particular settlements.

Councillor Pemberton expressed thanks to the officers involved in writing this report, stating that he felt confident in the evidence base provided. Councillor Cooke echoed these sentiments, requesting that the expression of gratitude to officers be recorded in the minutes.

Following comments from Councillor Boad, the Warwick District Liberal Democrat Group Observer, and the Whitnash Residents' Association Group about the clarity of the report, Councillor Pemberton offered to work with Councillor Cooke and officers to help Town and Parish Councils comment on the analysis on settlements. He suggested that the timetable with anticipated dates and summaries (suggested by Councillor Parry) could also have keys included to help explain further.

In response to a question about the budget from WDC for this report, Councillor Hales reassured Members that the rest of the budget would be provided, but for now officers were still working on where the allocation would be coming from.

After suggestions from Councillor Pemberton about a joint Overview and Scrutiny Committee, the Chair of the WDC Overview & Scrutiny Committee recognised the importance of joint working but noted that this was being done by the Joint Cabinet meetings. He stated that he was elected to represent the interests of residents of Warwick District, and in order to do that properly the Scrutiny Committees needed to be kept separate.

Councillor Day stressed the importance of benefitting from the input of both Scrutiny Committee chairs at Joint Cabinet meetings but felt that the two Chairs should be trusted to bring their comments to Joint Cabinet individually. While there were things the two Councils had in common, there were other things that needed to be considered separately, and that could not be done with a Joint Overview & Scrutiny Committee.

Councillor Cooke then proposed that the recommendation from the WDC Overview & Scrutiny Committee be rejected and replaced with the following additional recommendation:

"That Parish and Town Councils are given the opportunity to comment on the settlement analysis prior to the Issues and Options consultation; and the Heads of Development, in consultation with the Portfolio Holders for Place and Economy and Planning and Place, make any subsequent factual and consistency changes, and any changes, as appropriate, following consultation with Parish and Town Councils, and ward members".

Councillor Cooke proposed the report as laid out, subject to the above additional recommendation proposed in the meeting.

It was therefore

RESOLVED:

- 1) That the Settlement Analysis evidence report, the results of which to be used to inform the preparation of the South Warwickshire Local Plan (SWLP), be endorsed; and
- 2) That Parish and Town Councils be given the opportunity to comment on the settlement analysis prior to the Issues and Options consultation; and the Heads of Development, in consultation with the Portfolio Holders for Place and Economy and Planning and Place, make any subsequent factual and consistency changes, and any changes, as appropriate, following consultation with Parish and Town Councils, and Ward Members.

14. Dates of future meetings

The Joint Cabinet Committee agreed that the next two meetings would take place at the Town Hall, Royal Leamington Spa, on the following dates:

- 21 September 2022 at 4pm; and
- 3 November 2022 at 4pm.

15. Urgent Business

There were no items of urgent business.

CHAIRMAN

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Joint Cabinet/Executive Committee
7 December 2022

Subject: South Warwickshire Local Plan Part 1 – Issues and Options Consultation

Lead Officers: John Careford, Head of Development,
Stratford-on-Avon District Council (01789 260801)

Philip Clarke Head of Place, Arts & Economy, Warwick District Council (01926 456518)

Portfolio Holders: Councillor D Pemberton, Councillor J Cooke

Summary

To endorse the South Warwickshire Local Plan Issues and Options document (attached at Appendix 5) for consultation commencing in January 2023. This report sets out the background to the consultation document itself. It also seeks to note the accompanying Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA).

Recommendations:

- (1) That the Housing & Economic Development Needs Assessment (HEDNA) (attached as Appendices 1 (a) and (b)) as providing a basis for continuing work on the South Warwickshire Local Plan be noted;**
 - (2) That the findings of the Sustainability Appraisal/Strategic Environmental Assessment (attached at Appendices 2 (a), (b) and (c)) that accompanies and informs the South Warwickshire Local Plan Issues and Options consultation be noted;**
 - (3) That the notes from the Duty to Co-operate meetings (attached at Appendix 3) as evidence of the ongoing, positive and proactive discussions with neighbouring Authorities be noted;**
 - (4) That the Evolving Spatial Growth Options' Topic Paper attached at Appendix 4 be noted and the South Warwickshire Local Plan Issues and Options document (attached at Appendix 5) for consultation be endorsed, commencing in January 2023; and**
 - (5) That the respective Portfolio Holders for Place (Stratford-on-Avon District Council) and Planning & Place (Warwick District Council), in consultation with the respective Head of Development and Head of Place, Arts & Economy, be authorised to make any final editorial amendments to Appendix 5, prior to commencement of the consultation.**
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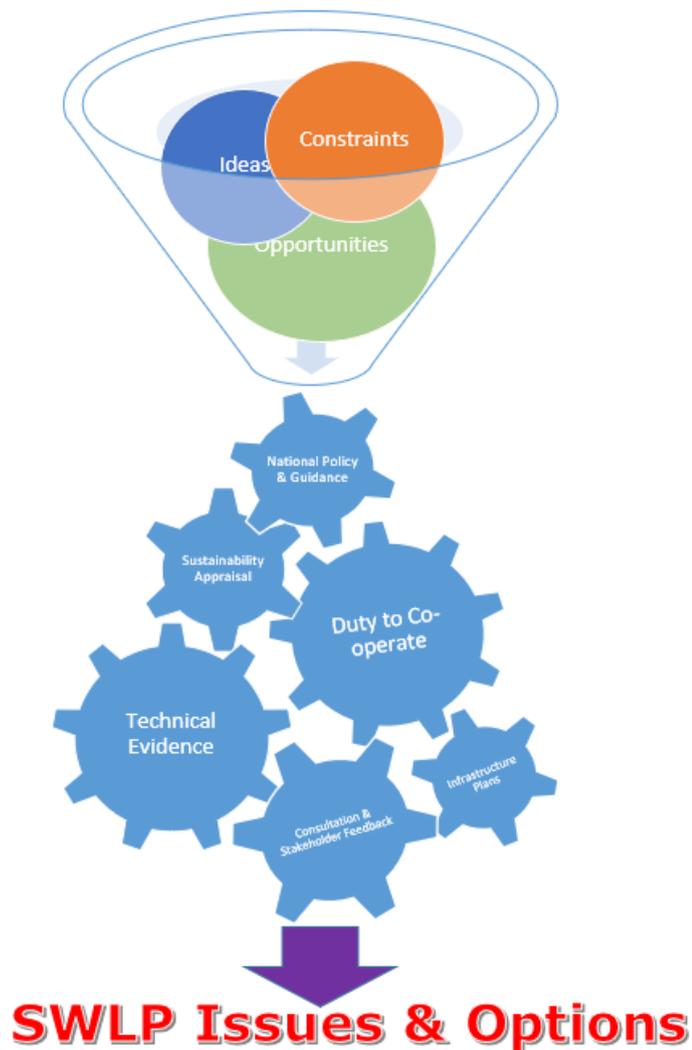
1 Background/Information

- 1.1 The South Warwickshire Local Plan (SWLP) is the name for a suite of planning documents that will manage development across Stratford-on-Avon and Warwick Districts to 2050. The SWLP is being prepared in parts, with work underway on Part 1 focusing on strategic planning matters, e.g. how much development goes where. In summary, Part 1 aims to establish a new planning strategy and principles for development that sets a robust yet flexible framework for subsequent detailed local plan documents.
- 1.2 Preparing a Local Plan is not a one-off event and there are numerous stages of preparation and public consultation. In terms of the SWLP Part 1, this is the second stage of preparation and follows on from the Scoping and Call for Sites Consultation undertaken in summer 2021. More information about the previous consultation is available at www.southwarwickshire.org.uk/swlp. The stages of plan-preparation are as follows:
1. Scoping and Call for Sites (including public consultation)
 2. Issues and Options (including public consultation)
 3. Preferred Options (including public consultation)
 4. Publication (including public consultation)
 5. Submission
 6. Examination
 7. Main Modifications (including public consultation)
 8. Adoption
- 1.3 As can be seen, the Councils are still at an early stage of plan preparation and the Issues and Options (I&O) is very much an ideas paper that asks a series of questions about how both Councils might best address the difficult development challenges facing South Warwickshire to 2050. Following the consultation there will be refinement of the plan and further rounds of public and stakeholder engagement. This process of refinement can be conceptualised as the image in Figure 1 (below). Indeed, it is important to stress that the Issues and Options consultation is an ideas paper where we explore a variety of options and seek feedback on those proposals. The Issues and Options is not making any decisions – although the SWLP will, of course, need to make difficult decisions in due course.
- 1.4 It should also be noted that, although there are various rounds of formal consultation, preparation of the plan also includes ongoing engagement throughout. An example of this is the large map and toy brick exercises held over the summer with stakeholders that have helped shape the content of this document.
- 1.5 A key stage is Preferred Options (Stage 3), as this will be the first draft version of the actual plan itself. This then gets refined until we are ready to submit what we consider to be the final version of the plan for examination. The purpose of the Examination in Public is to test that the plan has been prepared properly and is fit for purpose (i.e. sound) in that it has been prepared positively to meet the development challenges facing the Districts. This point is important – whilst it is our plan, we do not have

a 'free hand'. The benefit of having a plan is that both Councils retain control of plan-making across South Warwickshire and can better ensure that development (that will happen regardless) reflects both Councils' aspirations, ambitions and objectives.

- 1.6 The SWLP is essential in delivering on both Councils' economic development aspirations to grow the economy post COVID-19 and capitalise on economic assets, including through the provision of additional high-quality jobs.

Figure 1: Local Plan Refinement



- 1.7 In preparing the SWLP, aside from the Joint Committee, there are three key groups. The first is the Member Advisory Group comprising cross-party members from both District Councils that meets regularly to provide a steer on the preparation of the SWLP. The second is the Officer Steering Group comprising officers from across both Councils and Warwickshire County Council. The third group is the Place Board and its associated infrastructure groups which acts as a forum for ongoing engagement, most recently the large map and toy brick exercises.

Recommendation 1: Housing & Economic Development Needs Assessment (HEDNA)

- 1.8 A Housing & Economic Development Needs Assessment (HEDNA) has been prepared to support the work on the SWLP and it will be an important part of the evidence base for the Plan. The purpose of the HEDNA is to provide a joint and integrated assessment of the likely future needs for housing and employment land, taking into account the economic potential and needs of all households in South Warwickshire for the period up to 2050 (the proposed end date of the SWLP). It is good practice to commission such studies jointly with other authorities because housing needs should be considered across wider "Housing Market Areas". South Warwickshire lies in the Coventry & Warwickshire Housing Market Area. This HEDNA has therefore been commissioned jointly by all the local authorities across Coventry and Warwickshire. It has been undertaken by a team of independent consultants led by Icen Projects. A copy of the Executive Summary of the HEDNA is attached as Appendix 1(a) and the full report as Appendix 1(b) (combined as Appendix 1 to the report).
- 1.9 The key findings of the HEDNA are as follows.
- 1.10 It identifies a need for 345 ha of land for **office and general industrial development** in South Warwickshire to 2050. In addition, it identifies a sub-regional need for strategic warehousing/ logistics which will need to be met across the sub-region. This is shown in figure 2 below.

Figure 2: Employment Land Needs 2021-2050 (ha)

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Total
Office	10.0	7.0	3.0	6.5	7.2	15.8	49.5
General Industrial	214.0	81.4	66.0	218.2	240.9	81.4	901.9
Sub total	224.0	88.4	69.0	224.7	248.1	97.2	951.4
Strategic warehousing / distribution (B8)							709

- 1.11 It identifies a need for South Warwickshire to deliver **1,679 new homes** per year (868 for SDC and 811 for WDC) to meet both Councils' housing needs. This is shown in figure 3 below.

Figure 3: Overall Housing Need (dwellings per annum)

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Housing Market Area
2014-based Projections	3,188	176	435	516	564	675	5,554
HEDNA	1,964	119	409	735	868	811	4,906

- 1.12 It is important to understand the basis upon which the HEDNA has derived these figures. The Government has set out a standard method for assessing housing need. This takes 2014-based Household Projections (produced by the Office for National Statistics (ONS)) as its starting point. (The 2014-based Household Projections are household numbers based on long-term demographic trends over a 25-year period.) The standard method then uses a prescribed approach which applies an uplift to this based on the relative housing affordability position of individual local authorities. For cities such as Coventry, a further 35% uplift is also applied.
- 1.13 The standard method, as applied across Coventry and Warwickshire, is shown in figure 3 above. As can be seen, across the Housing Market Area, using the 2014-based projections, gives a higher overall housing figure than the HEDNA is projecting, however a lower figure for Stratford-on-Avon and Warwick Districts.
- 1.14 It would be normal to use the 2014-based projections as the basis for estimating housing need. The reason that the HEDNA has not done this is because recent initial outputs from the 2021 census have revealed that previous household projections produced by the Office for National Statistics, particularly as they relate to the population of Coventry, have overestimated the population of the city. As such, there are concerns about any projections of future population based on these old projections. The HEDNA has also applied more up-to-date (and therefore accurate) assumptions about fertility, mortality and household formation rates. The 2021 census is a more robust and reliable basis for considering population projections.
- 1.15 The HEDNA identifies a total need for **affordable housing** across South Warwickshire of c1,388 per year. This includes both those in need of social/affordable rented homes and those with affordable home ownership needs. This figure does not mean that the SWLP should seek to meet this need in full through new dwellings, as there are different ways in which this need can be met. It will provide a basis upon which further work can be done to explore how to deliver affordable homes through the SWLP to meet the needs of both Councils' communities.
- 1.16 The HEDNA also provides guidance on suggested **mix of houses** of different sizes, levels of **specialist housing need** and levels of **self and custom build housing**. It also considers the issue of the **student** population.
- 1.17 It should be noted that whilst the HEDNA looks at the issue of the need for employment and housing across all authorities in the sub-region, it does not make any assessment of whether those needs can be met within each local authority area. Currently part of SDC's overall housing requirement in the Core Strategy is to meet needs from the Greater Birmingham & Black Country Housing Market Area. Similarly, part of WDC's overall housing requirement in the current Local Plan is to meet Coventry's housing need. As part of preparing the SWLP, there will need to be further discussions with adjacent and other authorities to establish how any unmet needs in any authority area will be met in surrounding

authorities. This is part of the "Duty to Cooperate" process (see also later in this report).

- 1.18 Although the figures contained in the HEDNA are challenging for the SWLP, they do represent up-to-date evidence based, importantly, on the latest 2021 census. Whilst there will undoubtedly be questions that both councils, and many local stakeholders, will want to ask about the figures in the HEDNA, they do provide a credible basis on which to explore the issues and options that the SWLP will need to consider. Importantly, publishing the HEDNA alongside the Issues & Options paper will give an opportunity for all interested parties to comment on the HEDNA. The public consultation on the Issues & Options paper will invite anyone to provide their own evidence if they believe the HEDNA figures to be incorrect. This will allow further opportunity for both Councils to consider this issue.

Recommendation 2: Sustainability Appraisal/ Strategic Environmental Assessment

- 1.19 Preparation of the plan is supported by a suite of technical studies, many of which have been undertaken by independent expert consultants. The technical studies which have informed the Issues and Options consultation include:
- Bus Accessibility Mapping
 - Climate Change Baseline Report
 - Climate Change Emissions Assessment
 - Equalities Impact Assessment
 - Habitat Regulations Assessment (HRA)
 - Heritage and Settlement Sensitivity Assessment
 - Housing and Economic Development Needs Assessment (HEDNA)
 - Strategic Flood Risk Assessment (SFRA) Part 1
 - Sustainability Appraisal (SA)
 - Urban Capacity Study
- 1.20 Officers have also undertaken technical work in respect of settlement connectivity, density, and accessibility to local services and facilities and this work was previously endorsed by the Joint Committee.
- 1.21 All the technical work is available to view on the website at www.southwarwickshire.org.uk/swlp. Further technical work will also be undertaken to support the next stage of plan preparation.
- 1.22 The three key pieces of technical evidence are the Housing and Economic Development Needs Assessment or HEDNA which considers how many jobs and homes both Districts may need to 2050 as well as issues such as housing affordability, mix and tenure (see separate report); the Climate Change Study and the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA).

- 1.23 Given the importance of embedding climate change mitigation and adaptation principles throughout the Local Plan, consultants have been appointed to collect a series of climate change related evidence. At this Issues and Options stage two reports have been prepared. Firstly, a baseline report which sets the context and starting point for the two authorities and identifies opportunities to embed climate change considerations into the Local Plan. In addition, an emissions assessment report explains how a carbon model has been developed to test and compare the emissions associated with the various options in the Issues and Options in relation to the different growth options and the potential locations for new settlements. The intention is for this model to be further developed as the Plan progresses and become more refined as the strategy evolves towards a preferred approach.
- 1.24 A Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) is an essential component in the production of the local plan, informing and influencing plan preparation to optimise its sustainable development performance. An SA/SEA is an iterative and ongoing process, and each stage of consultation will be accompanied by an SA/SEA report.
- 1.25 To help ensure that the Issues and Options document includes the most suitable planning policies and development allocations, the SA/SEA identifies, describes and evaluates a number of different reasonable alternative policies and development locations. The SA/SEA has been included as Appendices to this report: **Appendix 2(a)** is a non-technical summary, **2(b)** is the full SA/SEA report and **2(c)** contains the Appendices to the SA/SEA report (combined as Appendix 2 to this report). The SA/SEA explores the following reasonable alternatives:
- 5 Growth Options which provide details about where development should be distributed at a strategic scale across the South Warwickshire area
 - 7 New Settlement Locations for large-scale development of not less than 6,000 new homes and associated infrastructure
 - 32 Broad Locations which represents options for up to 2,000 homes located around the main settlements for medium scale development and associated infrastructure in any one Broad Location
 - 22 Small Settlement locations for intermediate scale development for between 50-500 homes in any one location, typically associated with smaller settlements and villages
 - 88 Policy alternative options for shaping the relevant policies. Examples of subjects include climate change, tourism and health.
- 1.26 The appraisal process uses a framework comprising 14 objectives assessed using the scoring matrix shown in Figure 4 to evaluate how the different reasonable alternatives perform against sustainability objectives. It provides a way in which sustainability effects can be described, analysed and compared.

Figure 4 SA/SEA Scoring Matrix

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributions to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributions to the achievement of the SA Objective to some extent.	+
Negligible Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Adverse Impact	The proposed option prevents the achievement of the SA Objective to some extent. Mitigation solutions are achievable, and or complex, with a relatively low level of intervention.	-
Major Adverse Impact	The proposed option prevents the achievement of the SA Objective to a significant extent. Mitigation solutions are likely to be complex, if at all possible. A high level of intervention is required.	--

1.27 At this stage, it is difficult to identify stand out best performing options because they all perform best for different SA Objectives and rarely does one option emerge as a best overall option. Whilst the accompanying assessment matrices provide a helpful summary, they reflect a much broader assessment based on the 'lowest common denominator' and do not, at this stage, take into account any mitigation with could have the effect of minimising any adverse impacts.

Recommendation 3: Duty to Co-operate

1.28 Section 33A of the Planning and Compulsory Purchase Act requires Local Planning Authorities "to engage constructively, actively and on an ongoing basis" in respect of their plan-making activities. The Duty to Co-operate requirement is expanded on in the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG). The Duty to Co-operate is a legal test that needs to be satisfied as part of the local plan examination process in order for a local plan to be found sound and adopted. Unlike other tests of soundness which can be amended or remedied as part of the examination, the Duty to Co-operate is considered to be a pass/fail test.

1.29 In exercising this function, officers have commenced discussions with neighboring planning authorities in respect of the SWLP to understand if there are any strategic cross-boundary matters that the SWLP needs to address. These conversations will continue as the SWLP progresses. Conversations will also need to be held with other Duty to Co-operate bodies, as appropriate.

- 1.30 Importantly, the Duty to Co-operate is not a duty to agree *per se*, but local planning authorities must demonstrate that they have engaged constructively in respect of progress to addressing strategic cross-boundary matters. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 1.31 Discussions have been ongoing with a number of organisations through the preparation of the SWLP. Most recently, officers have met with representatives from neighbouring authorities and the notes of these meetings are attached at **Appendix 3**:
- Birmingham
 - Cherwell
 - Cotswold
 - Coventry
 - Redditch and Bromsgrove
 - Rugby
 - Solihull
 - West Northants
 - Wychavon
 - Worcestershire
- 1.32 In addition, officers are represented on the Coventry, Solihull and Warwickshire and Greater Birmingham and Black Country Duty to Co-operate Groups.
- 1.33 The biggest issues raised through Duty to Co-operate relate to dealing with the housing shortfalls from both Birmingham and Coventry.
- 1.34 The issue of any shortfalls arising from Coventry are considered in the accompanying report on the Housing and Economic Development Needs Assessment (HEDNA).
- 1.35 In respect of Birmingham and the Black Country, in addition to the shortfalls identified for the period to 2031, Birmingham City Council has also commenced work on its Local Plan Review to 2042 and has published an Issues and Options consultation that identifies a shortfall in housing of 78,415 homes. Additional shortfalls may also be identified arising from the Black Country authorities. The SWLP will need to continue to work with these authorities to explore whether it is appropriate for South Warwickshire to contribute in helping address these shortfalls.

Recommendation 4 & 5: Issues and Options (I&O) Document

- 1.36 The I&O document is a long document; by its nature it has to be because it is seeking to deal with a large number of interconnected issues. The document is arranged over 13 chapters comprising over 100 questions, including an introduction, guidance on how to provide feedback and a glossary. The Issues and Options document is attached at **Appendix 5**. The main body of the document is as follows:

- Chapter 3 – sets out both Councils’ proposed vision and the five overarching strategic objectives, including addressing climate change
 - Chapter 4 – sets out different geographical/spatial approaches for meeting both Councils’ development needs to 2050, including infrastructure. This chapter also considers the use of brownfield land and urban capacity, the potential for existing settlements to expand, the potential for new settlements, and the role of the Green Belt
 - Chapter 5 – considers how both Councils might meet their economic development needs and achieve low carbon economic growth
 - Chapter 6 – sets out how both Councils might meet their housing development needs, including issues such as affordability and tenure
 - Chapter 7 – considers options for achieving a climate resilient and net zero carbon South Warwickshire, including issues such as flood risk
 - Chapter 8 – sets out approaches to achieving a well-designed South Warwickshire
 - Chapter 9 - sets out approaches to achieving a healthy South Warwickshire
 - Chapter 10 - sets out approaches to achieving a well-connected South Warwickshire
 - Chapter 11 - sets out approaches to achieving a biodiverse and environmentally resilient South Warwickshire
- 1.37 The main body concludes with Chapter 12 that considers the relationship with the existing local plan policies and the approach to preparing Part 1 and Part 2 plans.
- 1.38 Another Call for Sites exercise will be held alongside the Issues and Options consultation to seek further suggestions for land. Again, the benefit of this approach is one of transparency.
- 1.39 As part of the consultation, a summary and explanatory guide is being produced to help readers navigate through the document. Animated videos are also being produced which will be a key feature of the social media campaign. A series of face-to-face ‘drop-in’ sessions will also be undertaken at locations across South Warwickshire throughout the consultation period.
- 1.40 The vision and strategic objectives for the SWLP are proposed as follows, having been amended following the earlier scoping consultation. In particular, a fifth objective relating to design has been added.

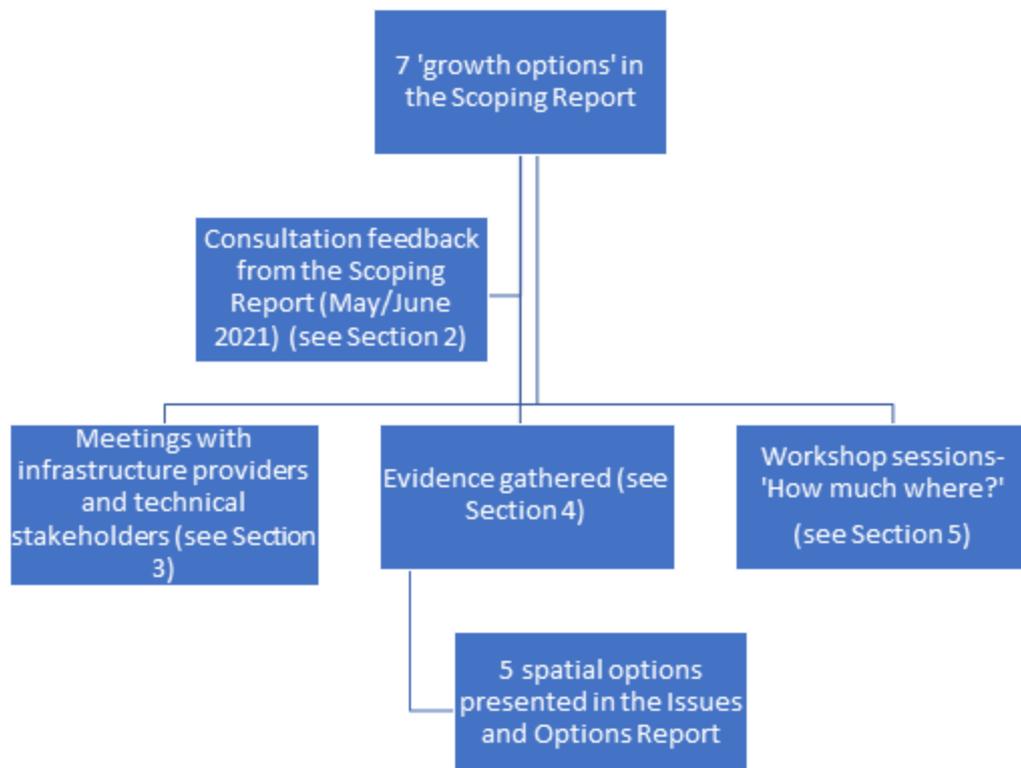
The vision is to meet South Warwickshire’s sustainable development needs to 2050, while responding to the climate emergency. Where appropriate and agreed, this could include unmet need from neighbouring authorities. The plan will provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time. Five overarching principles will determine how this

development is delivered:

- *A climate resilient and Net Zero Carbon South Warwickshire – adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development*
- *A well-designed and beautiful South Warwickshire – creating spaces where people want to be, which respect and reflect the existing beauty and heritage of the area*
- *A healthy, safe and inclusive South Warwickshire – enabling everyone to enjoy safe and healthy lifestyles with a good quality of life*
- *A well-connected South Warwickshire – ensuring that development is physically and digitally connected, provided in accessible locations, and promotes active travel*
- *A biodiverse and environmentally resilient South Warwickshire – strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire*

1.41 Whilst climate change sits at the core of the SWLP, the starting point of the plan has been green and blue infrastructure and the desire to tie the plan into the local nature recovery agenda. Officers have prepared a Topic Paper (attached at **Appendix 4**) setting out how the strategy for distributing economic and housing growth has then emerged, as presented in five spatial options. Figure 5 is a 'route map' to those five options.

Figure 5: Route Map to the Five Spatial Options



- 1.42 The five growth options represent alternative scenarios for distributing, at a strategic scale, development across the South Warwickshire area. At this early stage, they remain conceptual and further detailed technical work is required to assess particular locations.
- 1.43 In formulating the growth options, consideration has been given to various locations across South Warwickshire, including 32 'main settlements' as well as 22 smaller settlements. In addition, consideration has also been given to seven potential broad locations for large scale new settlements.
- 1.44 At this early stage, the above work includes Green Belt locations. If, as a result of this consultation, there is a desire to further explore such locations, a Green Belt Study will need to be undertaken to inform which locations, if any, the Green Belt will need to be reviewed. That study will then confirm whether any potential Green Belt locations should be released. The study could also make recommendations in respect of 'greening' the Green Belt (to improve its environmental quality) and/or extending the Green Belt, including to potentially compensate for any Green Belt loss.
- 1.45 Also at the forefront of the Issues and Options consultation is the need to address the concerns relating to the provision of infrastructure. It was to this end that the Place Board was established, with a number of infrastructure groups, to act as a forum for stakeholders and infrastructure providers to engage with the SWLP. In preparing the Issues and Options consultation, officers have met with infrastructure providers to discuss how their plans and strategies may impact on or be impacted by the proposals in the SWLP. These discussions are ongoing and will need to be ramped up as we progress the SWLP.
- 1.46 The Issues and Options consultation also poses questions about how we fund infrastructure through the use of the Community Infrastructure Levy (CIL) charge.
- 1.47 Notwithstanding the fact that a considerable amount of work has gone into preparing this document, it is likely that minor changes will need to be made as the report is prepared for public consultation. For this reason, recommendation (5) above asks that the respective Portfolio Holders for Place (Stratford-on-Avon District Council) and Planning & Place (Warwick District Council), in consultation with the respective Head of Development and Head of Place, Arts & Economy, be authorised to make any final editorial amendments prior to commencement of the consultation.

2 Options available to the Joint Cabinet/Executive Committee

- 2.1 There are two substantive recommendations in this report: the first in respect of the accompanying SA/SEA and the second in respect of the Issues and Options consultation document itself.
- 2.2 Please note, substantial changes to the SA/SEA could have a bearing on the I&O document and whether any further work is required in advance of consultation.
- 2.3 There are potentially two options available to Members: the first is to not support the recommendations with a view to not proceeding with the

consultation and the second is to seek changes to the document beyond the scope of any editorial amendments.

- 2.4 The first alternative option would indicate that there is no desire to prepare a joint Local Plan for South Warwickshire. The second would significantly delay the consultation, which, owing to purdah, would then take place in Summer 2023.
- 2.5 Both options are not recommended. The Issues and Options document is very much an ideas paper where questions are asked regarding how we can collectively deal with the challenges facing South Warwickshire. Publishing and consulting now puts the two Councils in control of the planning agenda and demonstrates that together we are trying to address the difficult challenges that we all face rather than pretending that those challenges don't exist or 'kicking the can down the road'.

3 Ward Councillors and Portfolio Holder Members' Comments

- 3.1 The two Portfolio Holders for Place (SDC) and Planning & Place (WDC) have been fully involved throughout this process and are supportive of the recommendations. The SWLP Member Advisory Group, which includes a number of Ward Councillors, meets monthly and is supportive of the proposed approach.

4 Implications of the proposal

4.1 Legal/Human Rights Implications

- 4.1.1 The South Warwickshire Local Plan is a Development Plan Document and as such, when adopted, will form part of the statutory Development Plan for both Districts. As such, its preparation has to comply with a number of statutory requirements including public consultation, regard to national policy, the achievement of sustainable development and fulfilment of the Duty to Co-operate. As a Development Plan document, it will be subject to independent scrutiny through an examination in public to ensure that it is 'sound' (fit for purpose) and satisfies all necessary legal requirements. This includes ensuring that residents and stakeholders can engage meaningfully in the process.

4.2 Financial

- 4.2.1 The estimated cost of producing and getting the South Warwickshire Local Plan in place is £2.2 million, excluding staff costs. This cost is to be shared equally between Stratford-on-Avon and Warwick District Councils. Stratford-on-Avon has £1.3 million in place within the Core Strategy Funding Reserve to fund its share. Warwick currently has £0.5 million allocated, including £0.3 million as part of the 2022/23 Budget. Further funding from Warwick will need to be agreed as part of future Budgets.

4.3 Environmental/Climate Change Implications

- 4.3.1 Tackling Climate change and responding to the Climate Emergencies that both Councils have declared is at the heart of the South Warwickshire Local Plan. In order to maximise opportunities for climate change adaptation and mitigation, and to meet net carbon zero targets, it is critical that the evolving Plan is informed by assessments on its impact on climate change. As such, consultants have been appointed to prepare these assessments and ensure that all aspects of climate change are

considered as part of the SWLP. The Programme Director for Climate Change is directly involved in this work.

4.4 **Council Plan**

4.4.1 As a Development Plan Document, the South Warwickshire Local Plan will help Stratford-on-Avon District Council achieve all five objectives of the Council Plan. Arguably, the Local Plan is the most important policy document that the Council prepares as it represents the spatial expression of the Council's vision and ambitions.

4.4.2 In respect of the Warwick District Business Plan, the following comments can be made:

4.4.3 **External impacts of proposal(s)**

People - Health, Homes, Communities – The SWLP will have a major impact on the Council's ability to meet its housing needs, including the provision of affordable housing, and to provide sports, recreation, leisure, community and cultural facilities to serve its population.

Services - Green, Clean, Safe – The SWLP will have a major impact on all the Council's "green, clean and safe" aspirations. It will support the Council's ability to meet its climate change targets through the planning policies it puts in place regarding the location of new development and standards for new buildings. Policies in the Local Plan will also support safer communities.

Money- Infrastructure, Enterprise, Employment – The SWLP will have a major impact on the Council's ability to support the local economy through providing appropriate and affordable places of work in the right locations and by other policies to support the economy, including within the district's town centres.

4.4.4 **Internal impacts of the proposal(s)**

People - Effective Staff – It will be integral to the success of the SWLP that staff are properly trained and supported to undertake a wider range of tasks. As this is a joint Local Plan, then the councils will need to work together to ensure that proper training and support is given to staff across both councils.

Services - Maintain or Improve Services - Good stakeholder engagement and public consultation are key to ensuring the success of the SWLP.

Money - Firm Financial Footing over the Longer Term - It is anticipated that the SWLP will save costs over each authority undertaking its Local Plan review separately. This will be kept under close review throughout the process.

4.5 **Analysis of the effects on Equality**

4.5.1 An Equalities Impact Assessment is required and will be undertaken at various stages of the SWLP to ensure that strategies and policies contribute towards eliminating discrimination, promoting equality and fostering good relations.

4.6 **Data Protection**

4.6.1 Both Councils will ensure that all data protection requirements are adhered to. This will particularly be the case in respect of personal or commercially sensitive information that is provided to the Council through public consultations.

5 Risk Assessment

5.1.1 There are many risks associated with undertaking a Local Plan review. These are financial, reputational and, sometimes, legal. All local authorities are required to prepare Local Plans and both Councils are experienced in managing these risks. All stages of the Local Plan are subject to Councillor advice, scrutiny and approval, so there is plenty of opportunity for Councillors to have proper oversight of the technical work and procedures that are being undertaken.

5.1.2 There are additional risks in undertaking a joint Local Plan review with another local authority, as is being undertaken here. These are largely political and relate to the willingness of both Councils to continue to work together to approve the document.

5.1.3 Ultimately, as local planning authorities, both Stratford-on-Avon and Warwick District Councils are obliged to prepare and keep an up to date Development Plan for their area. The SDC Core Strategy was adopted in 2016 and the WDC Local Plan in 2017. Whilst both plans remain up to date, it is prudent to start to consider now planning for the period post 2031/2029 when those plans expire. It is also timely, in light of the COVID pandemic, to use the Development Plan process to support economic growth and the rebuilding of the South Warwickshire economy.

Background papers:

None

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Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA)

Executive Summary

Iceni Projects Limited on behalf of Coventry &
Warwickshire Local Authorities

November 2022

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1. INTRODUCTION

- 1.1 This Housing and Economic Development Needs Assessment (HEDNA) has been prepared to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs over the period to 2041 and 2050. It has been prepared by a consultancy team which includes Icen Projects, Cambridge Econometrics, MDS Transmodal and Justin Gardner Consulting (JGC).
- 1.2 The HEDNA evidence shows that Coventry and Warwickshire can be regarded as a coherent housing market area and 'best fit' functional economic market area, albeit that there are differences in the economic characteristics between the north and south of the area, with Coventry and the north of the area more focused towards manufacturing, warehousing and logistics; with South Warwickshire having a more service-orientated economy and higher housing costs. Overlaps are identified with other areas, in particular in North Warwickshire and Stratford-on-Avon districts towards Birmingham; between Rugby and Northamptonshire; and across the A5 with Hinckley and Bosworth.

2. ECONOMY AND EMPLOYMENT LAND REQUIREMENTS

Key Economic Characteristics

- 2.1 Coventry and Warwickshire is a £26 billion economy, accounting for 19% of West Midlands GVA. Immediately prior to the Covid-19 pandemic, growth in GVA was slightly out-performing regional and national trends reflecting stronger performance of the sub-regional economy post 2013. Total employment in 2019 across Coventry and Warwickshire is estimated at 526,900 jobs. Whilst more recent data is not available at the local level, the regional evidence suggests total employment has now returned to the pre-Covid position. The strongest economic performance in recent years has been in Coventry and South Warwickshire and these are the areas which have a stronger skills profile, with higher representation of those with degree-level skills, and a higher business density.
- 2.2 Economic participation rate in the sub-region (79.3%) is marginally above the national rate (78.8%) but considerably stronger than the region (77.5%). It is lower in Coventry than other areas. The onset of Covid-19 led to an increase in unemployment, and whilst levels have since fallen there remains a particular concentration of unemployed persons in Coventry.
- 2.3 Manufacturing is the largest sector in employment terms, accommodating 58,000 jobs, and is both a significant employment and an important contributor to wealth creation within the economy. Other sectors which are strongly represented include those associated with warehousing and logistics, which accommodates amongst 48,000 jobs; together with education, with the universities in particular

being an important economic asset and form part of the manufacturing ecosystem. The sub-region is an important centre for automotive R&D. A local cluster of gaming design companies has grown in Leamington Spa.

Property Market Dynamics

Office Market

- 2.4 The 2010-20 decade saw relatively strong performance of the office market in Coventry and Warwickshire, with positive net absorption of space and a falling vacancy rate across the market between 2010-18 influenced in part by declining total stock volumes as losses through conversions and redevelopment exceeded new floorspace delivered. Office floorspace provision within Coventry and Warwickshire peaked in 2012.
- 2.5 The Covid-19 pandemic coupled with virtual communications technologies has accelerated shifts in working patterns and led to a substantial growth in home-working. Coupled with the delivery of new space, this has led to an increase in the vacancy rate of office floorspace which stands, as at September 2022, at 6.2% across the sub-region. The market is however seeing a 'flight to quality' with continued demand for good quality, modern floorspace; but lower demand for more dated, older office floorspace which in some areas may provide opportunities for redevelopment.
- 2.6 The stronger office markets in the sub-region are Coventry and Leamington Spa, and new-build development can be expected to be focused in these areas. Beyond these markets, rental levels mean that delivery of office floorspace is commercially challenging and may require cross-subsidy and/or public sector support/intervention.

Industrial and Logistics Market

- 2.7 The sub-region, and in particular the northern and central parts of it, clearly has a strong and dynamic industrial market. The evidence points to a very significant stock of industrial floorspace at over 8 million square meters of space and sustained high take-up over the period since 2013. Whilst there are some challenges for the automotive sector, which can be relatively cyclical and has influenced strong take-up in recent years, demand for logistics/distribution space looks likely to remain strong buoyed by the growth in e-retailing in particular. Other influences on market demand include increased stock holding requirements, influenced by Brexit and other factors influencing trade, as well as demand for modern floorspace which aligns with companies' ESG requirements, is energy efficient and has sufficient power capacity, including to facilitate increased automation.
- 2.8 Available industrial space remains low and the strength of demand has support strong recent development activity together with strong growth in rents, with a very substantial 1.3 million sq. m of space delivered since 2013 with over 1 million sq. m over the 2015-20 period. New supply does appear to be coming forwards, not least as sites allocated in the last round of local plans start to

progress, but there will likely be a continuing need to replenish industrial supply over time if economic growth is not to be constrained.

Employment Land Needs

- 2.9 The HEDNA has considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. In doing so, it has modelled employment land needs utilising a range of different forecasting techniques alongside local intelligence and an understanding of the merits of different approaches in drawing conclusions. This approach of triangulating different approaches and testing findings, which Iceni has adopted, is consistent with the PPG.
- 2.10 The HEDNA considers economic forecasts prepared by Cambridge Econometrics. These take account of the short-term impacts of the pandemic, both on employment and GVA, but with longer-term growth slightly more modest than historical trends influenced by wider macro-economic circumstances. The forecasts expect the relative share of the economy which is within the ICT/media sector to grow; as are public sector-focused activities such as health and education. The manufacturing sector is expected to grow (with GVA increasing), albeit employment will not, influenced by automation. The greatest absolute growth in jobs is forecast in Coventry and Warwick influenced by the sectoral structure.
- 2.11 Alternative modelling approaches are also considered, including projections of net changes in floorspace (based on Valuation Office data), projections of past development trends (using completions monitoring). In addition MDS Transmodal's replacement demand and traffic growth forecasting model is used in considering the need for strategic B8 warehousing and distribution floorspace.
- 2.12 In the context of the need for office space, the HEDNA concludes that given that office requirements tend to be closely linked to employment levels, it is recommended that the labour demand models best represent future needs for office floorspace. The labour demand should best represent the future economic outlook and should be used in determining future floorspace needs for this sector. There is however some potential for changing working patterns to reduce office floorspace needs, and it is important that this is monitored. Nonetheless market trends are emphasising the need for good quality floorspace; and the HEDNA identifies that it is likely that future supply will be particularly concentrated in Warwick District and Coventry; whilst cross-subsidy through mixed use development or public funding may be required to support provision in other areas within the sub-region.
- 2.13 In respect of industrial and warehousing, the HEDNA concludes that neither the VOA or labour demand models are able to differentiate the strategic and more local industrial / warehouse requirements. As a result, the completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace particularly for the

short/medium-term. Comparing the completions data with other sources, monitoring by authorities suggests far higher levels of development have been achieved and therefore may be required in the future.

- 2.14 In respect of strategic warehousing floorspace (units of over 9,000 sq.m), the HEDNA concludes that it would be appropriate to plan for future development to be in line with recent completions trends over the initial 10 year period (2021-31), with the subsequent decade then seeing potentially slower growth in line with the traffic growth and replacement demand modelling. On this basis, the HEDNA concludes on a need for 606 ha of land to 2041, and 709 ha to 2050. Some of this need could however potentially be met through recycling of land – particularly where there are plots of over 10 ha in good quality locations which relate well to the strategic road network, have adequate power capacity and are accessible by public transport.
- 2.15 Icenis’s consultation exercise suggests that whilst B8 demand is very strong, there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.
- 2.16 Drawing the above together and factoring in an adjustment for a margin to incorporate flexibility, the HEDNA concludes on the employment land needs to 2041 and 2050 as set out in the tables below.

Table 2.1 Employment Land Needs 2021-2041

Hectares	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	606
N. and Bedworth	2.2	5.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.7	621.9	659.6	

Table 2.2 Employment Land Needs, 2021-50

Hectares	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	709
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	49.4	901.8	951.3	

2.17 Chapter 11 within the HEDNA report provides guidance on identifying suitable locations for strategic B8 development, and key corridors within which Iceni consider development is likely to be focused. Iceni recommend that assessment of supply is coordinated at a sub-regional level to integrate relevant considerations including landscape harm, power capacity, access to labour and to seek to limit harm to Green Belt purposes. It would not be appropriate in our view to simply replicate past development patterns in respect of the spatial distribution of development by local authority.

3. OVERALL HOUSING NEED

3.1 The Government sets out a standard method for assessing housing need which takes 2014-based Household Projections and applies uplifts to this based on the relative affordability position in individual local authorities to generate an annual housing need figure. For Coventry, as one of the main cities/ urban areas across England, a further 35% uplift is applied as directed by the methodology set out by Government.

3.2 The NPPF mandates the use of the 2014 subnational household projections (SNHP) in the Standard Method and following the relevant Planning Practice Guidance (PPG) the method shows a need for 5,554 dwellings per annum across the Housing Market Area (HMA). The PPG does however allow for authorities to diverge from the Standard Method where this can be justified by exceptional circumstances; and sets out that any alternative approach should reflect current and future demographic trends (including migration) and market signals.

3.3 The previous evidence has identified, and is has now been recognised by the Statistics Regulator and accepted by the Office for National Statistics (ONS), that there have been issues with estimating and projecting the population in Coventry. Initial Census data released in June 2022 supports this. It is clear that population growth in the City has been systematically over-estimated by ONS (dating

back to at least 2001) and that the over-estimation works through into population projections that are demonstrably too high and unrealistic. The population projections will then work through into household projections and ultimately to estimates of need in the Standard Method.

3.4 The HEDNA has therefore modelled new demographic projections which take account of the initial Census data releases and seek to assess how the population can be expected to change over time. The HEDNA then applies these alternative projections through the framework provided by the standard method.

3.5 The results of the housing needs modelling undertaken are shown below. The new trend-based projections point to a need for 4,906 dwellings annually across the sub-region, lower than the Standard Method (using 2014-based Household Projections) due to the clear issues with population data feeding into projections for Coventry. Because of the demographic interactions between authorities across the Housing Market Area, it is important that housing needs evidence is based on a consistent approach and consistent set of demographic data.

Table 3.1 Overall Housing Need (dpa)

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	HMA
2014-based	3,188	176	435	516	564	675	5,554
Trend-based	1,964	119	409	735	868	811	4,906

3.6 Given across the HMA that population figures have been over-estimated for many years, it is reasonable and expected that any alternative trend-based projection would show a lower need. It is however recommended that the Councils monitor new data releases from ONS (including MYE and projections) as ONS will need to grapple with the issue of inaccuracies in the MYE in any future releases.

3.7 Econometric forecasts do not point to as strong growth moving forwards as we have seen in recent years (with the economic forecasts showing additional job creation of c. 3,300 which falls below labour supply growth in the trend-based projections). Demographic growth (in the revised projections) therefore supports sufficient growth in labour supply across Coventry and Warwickshire as a whole; and there is therefore no case for adjusting upwards overall housing need.

3.8 However for North Warwickshire, there is a potential case for higher housing provision than the overall housing need figures shown in Table 3.1. This can be achieved through questions of the distribution of housing provision; and North Warwickshire's existing Plan makes provision for meeting unmet needs from other areas (Coventry and Birmingham) which contribute to labour force growth and thus achieve this.

3.9 Both Stratford-on-Avon and North Warwickshire districts sits across the Coventry & Warwickshire and Greater Birmingham Housing Market Areas. These authorities will therefore need to consider unmet needs from Birmingham in setting housing targets within their respective local plans alongside any unmet needs from within the Coventry & Warwickshire HMA.

3.10 In setting housing targets in individual local plans, the affordable housing evidence is also relevant. In the northern part of the sub-region in particular – in North Warwickshire and Nuneaton and Bedworth - this supports the case for considering, as part of the plan-making process, higher housing provision than shown in Table 15.5 in order to boost the delivery of affordable housing.

4. NEED FOR DIFFERENT TYPES OF HOMES

Affordable Housing

4.1 The HEDNA models the need for affordable housing using the approach set out by Government in Planning Practice Guidance (PPG). It identifies a net need for 3,833 social or affordable rented homes per annum across the sub-region from households who cannot afford to meet their needs within the open market.

4.2 The evidence indicates that around 20-30% of the rented need identified should theoretically be met through provision of affordable rented homes; but there are wider considerations to be taken into account in determining policies for new-build development, including individual council's priorities, what rents are charged for existing stock and viability considerations.

Table 4.1 Annual Need for Social / Affordable Rented Housing

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	495	1,667	653	2,816	929	1,887
North Warwickshire	40	163	52	256	124	131
Nuneaton & Bedworth	102	431	188	720	313	407
Rugby	77	398	166	640	233	407
Stratford-on-Avon	81	397	238	716	297	419
Warwick	132	571	204	907	325	582
Warwickshire	431	1,959	848	3,238	1,292	1,946
C & W	926	3,627	1,501	6,054	2,221	3,833

4.3 In addition the core analysis within the report indicates that there is a need for around 609 affordable home ownership homes per annum. The figures for individual authorities are set out in the table

below. The greatest need shown is in South Warwickshire, with the evidence pointing to a lack of or very modest need for affordable home ownership products in North Warwickshire and Nuneaton and Bedworth. This assumes some contribution to supply from sales of market homes below lower quartile prices.

Table 4.2 Estimated Need for Affordable Home Ownership by sub-area (per annum)

	Total Gross Need	Supply	Net need
Coventry	633	484	149
North Warwickshire	120	118	2
Nuneaton & Bedworth	214	230	-16
Rugby	296	208	88
Stratford-on-Avon	410	281	129
Warwick	553	296	258
Warwickshire	1,593	1,133	460
Coventry-Warwickshire	2,226	1,617	609

4.4 The affordable housing need is high relative to the overall housing need. However the two are not directly comparable, as the assessment of overall housing need looks at the overall need for additional homes; whereas the affordable housing need in part reflects an existing tenure imbalance. Future affordable housing delivery will be influenced by issues related to viability and the availability of funding. Policies for affordable housing provision within local plans should therefore be influenced by a combination of the needs evidence, viability evidence which examines what affordable housing can be viable delivered through mixed tenure schemes, together with Council priorities. The affordable need, in particular for social/ affordable rented homes, is a consideration in setting overall housing targets, but it should be recognised that viability and the availability of funding are realistically constraints on the level of provision which can be achieved.

4.5 Both First Homes and Shared Ownership will have a role to play in helping households with marginal affordability. The HEDNA indicates that First Homes should be priced at least the minimum discount of 30% of the Open Market Value (OMV). Shared ownership properties will also have a role in meeting needs and are suitable in particular for households with more marginal affordability and lower savings.

Sizes & Types of Homes Needed

4.6 The HEDNA models the implications of demographic dynamics on the need for different sizes of property by tenure, taking account of how households occupy homes with adjustments to address overcrowding and provide opportunities for rightsizing.

- 4.7 The analysis indicates that the need for social or affordable rented properties should be focused on smaller properties, as in this sector households size is more closely aligned to the sizes of homes. 70% of the need identified is for 1- and 2-bed properties; and 30% for properties with three or more bedrooms. The profile by individual local authority is shown below.

Table 4.3 Suggested Mix of Social/Affordable Rented Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	30%	35%	25%	10%
North Warwickshire	30%	35%	25%	10%
Nuneaton & Bedworth	25%	35%	30%	10%
Rugby	35%	30%	20%	15%
Stratford-on-Avon	40%	35%	20%	5%
Warwick	40%	35%	20%	5%
Warwickshire	35%	35%	20%	10%
Coventry-Warwickshire	35%	35%	20%	10%

- 4.8 Affordable home ownership homes should be focused on delivery of 2- and 3-bedroom properties, with the evidence pointing to a greater need for 2-bed homes than other property sizes.

Table 4.4 Suggested Mix of Affordable Home Ownership Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	20%	45%	25%	10%
North Warwickshire	20%	40%	30%	10%
Nuneaton & Bedworth	20%	40%	30%	10%
Rugby	20%	40%	30%	10%
Stratford-on-Avon	20%	45%	25%	10%
Warwick	20%	45%	25%	10%
Warwickshire	20%	40%	30%	10%
Coventry-Warwickshire	20%	45%	25%	10%

- 4.9 The mix of market homes needed is focused towards 2- and 3-bed properties, as shown below. This takes account of the ageing of the population and role which suitable housing provision can have in enabling rightsizing. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay. Provision of specialist housing can assist in releasing existing family homes and supporting turnover in the wider housing market.

Table 4.5 Suggested Mix of Market Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	10%	40%	40%	10%
North Warwickshire	10%	35%	45%	10%
Nuneaton & Bedworth	10%	35%	45%	10%
Rugby	10%	30%	45%	15%
Stratford-on-Avon	10%	35%	40%	15%
Warwick	10%	40%	40%	10%
Warwickshire	10%	35%	45%	10%
Coventry-Warwickshire	10%	40%	40%	10%

4.10 These figures are intended to be used as a monitoring tool rather than to be applied rigidly to all individual development sites. In applying the evidence, consideration should be given to the existing house mix in the locality and gaps within this; site location and characteristics; and local needs or market evidence (including from Council's housing registers). Additionally, the Councils should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.

Housing a growing Older Population

4.11 The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run. The availability of housing options which are accessible to older people will also provide the opportunity for older households to 'rightsize' which can help improve their quality of life.

4.12 The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:

- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth);
- A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;
- A need for around 1,960 housing units with support (sheltered/retirement housing) in Coventry and 1,840 units in Warwickshire – mainly affordable housing in Coventry and market homes in Warwickshire;

- A need for around 230 additional housing units with care (e.g. extra-care) in Coventry and over 2,000 in Warwickshire – focussed on market housing in both areas;
- A need for additional nursing care bedspaces and some residential care in Warwickshire; and
- a need for around 180 (Coventry) and 400 (Warwickshire) dwellings per annum to be for wheelchair users (meeting technical standard M4(3)).

4.13 On the basis of the evidence, the Council should consider requiring all dwellings (in all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and 10%+ of homes meeting M4(3) – wheelchair user dwellings (a higher proportion in the affordable sector). The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

4.14 The analysis suggests that there will be a notable need for both housing with support and housing with care (in both market and affordable sectors), as well as some additional nursing and residential care bedspaces. In Coventry the need is particularly for affordable housing (housing with support), with the opposite being the case in Warwickshire.

Table 4.6 Specialist Housing Need 2022-32 – Coventry

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall /surplus by 2032
Housing with support	Market	40	462	970	508	104	612
	Affordable	93	1,168	2,274	1,106	245	1,350
Total (housing with support)		133	1,630	3,244	1,614	349	1,963
Housing with care	Market	21	210	514	304	55	360
	Affordable	27	855	653	-202	70	-131
Total (housing with care)		48	1,065	1,168	103	126	228
Residential care bedspaces		42	1,203	1,038	-165	112	-53
Nursing care bedspaces		48	567	1,168	601	126	726
Total bedspaces		90	1,770	2,206	436	238	673

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 4.7 Specialist Housing Need 2022-32 – Warwickshire

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall /surplus by 2032
Housing with support	Market	58	1,913	3,560	1,647	843	2,490
	Affordable	60	5,198	3,695	-1,503	848	-655
Total (housing with support)		118	7,111	7,255	144	1,691	1,836
Housing with care	Market	27	721	1,665	944	392	1,336
	Affordable	15	477	947	470	217	687
Total (housing with care)		43	1,198	2,612	1,414	609	2,023
Residential care bedspaces		38	2,253	2,322	69	541	610
Nursing care bedspaces		43	2,261	2,612	351	609	960
Total bedspaces		80	4,514	4,934	420	1,150	1,570

Source: Derived from Demographic Projections and Housing LIN/EAC

Self and Custom Housebuilding

- 4.15 Self-build and custom housebuilding is a growing sector of the housing market, and one which has potential to contribute to housing delivery. All of the local authorities in the study area introduced a Self-Build and Custom Housebuilding Register on 1st April 2016 in line with the requirements of legislation. If assessed over the five base periods to date, there has been an average of 155 registered expressions of interest per annum in a serviced plot of land.
- 4.16 Each of the local authorities have a local plan policy (or draft policy) supporting Self and Custom Build development. In addition to a specific policy, Rugby, Stratford-on-Avon and Warwick have also produced an SPG. Iceni consider that in order to respond to demand in the sector, and in response to the PPG's requirements, the Councils - particularly those in South Warwickshire where demand is greatest - should continue to express active support self and custom build homes, but should also consider seeking a percentage of self and custom build on larger sites with an appropriate fallback mechanism should plots fail to sell; consider opportunities to identify specific sites for serviced plots (i.e. on public sector land, where available) and encourage developers as part of the overall housing mix to incorporate serviced plots where there is evidence of strong demand.

Private Rented Sector and Build to Rent

- 4.17 The Private Rented Sector has been the key growth sector in the housing market for the last 15 years and now makes up just over 20% of all UK households. Across the study area, the growth in the private rented sector was strong over the last two census points outperforming the national trend between 2001-11. There are different components to the sector, including a student market in Coventry and Warwick District. Across the board, the private rented sector supported around 37% of

all Universal Credit claimants with a high of 41% in Coventry City and a low of 25% in Warwick District.

- 4.18 Over recent years, successive Governments have looked to the private rented sector to play a greater role in providing more new build housing and have sought to encourage “Build to Rent” development. BTR development has been delivered in Coventry and Stratford-upon-Avon, with development also now coming forward in Rugby. The HEDNA identifies the potential for BTR development in these authorities and in Warwick; both within town centre locations and potential through suburban build-to-rent development over time. The HEDNA also provides guidance on how the potential for Co-living can be considered and monitored.
- 4.19 In line with national policy, affordable housing in Build-to-Rent development should be provided as affordable private rented housing, with the PPG setting out that 20% should be sought at a 20% discount to market rents, subject to viability.

Student Housing Needs

- 4.20 The area has two universities: Coventry University and Warwick University. Student numbers have grown at both Universities since 2001, however, Coventry has seen more substantial growth and is defined as the fastest growing University in the UK. Coventry City and Warwick District have very different dynamics, with the majority of households residing in all student households – which principally comprise HMOs - and student halls. In all other authority areas, the majority of students live at home with parents.
- 4.21 Iceni has engaged with both Universities to understand growth ambitions and the latest position with student accommodation provision. Coventry University have indicated that student numbers are expected to remain static for the next 2-3 years. However the University has plans to continue to grow the international student population moving forward which could have an impact on housing needs in the medium to long-term. This should be closely monitored.
- 4.22 At Warwick University, there are around 29,550 students studying on-campus of which c. 7,500 students are housed on-campus. The University is currently in the midst of developing its Strategy looking ahead to 2030, which Iceni understand intends to increase numbers at a “sustainable moderate growth rate.” The approach to housing all first year UG students will be maintained and there is a desire to also offer some additional accommodation to returning students.
- 4.23 There is a sizeable pipeline of student accommodation provision in Coventry, with around 9,275 bedspaces in the pipeline. If delivered, this provides the potential to reduce the number of students living in the wider housing market. As longer-term growth proposals become more clear, it will be important for the planning authorities to maintain dialogue with the two universities to appropriately

manage delivery of student accommodation and ensure it keeps pace with or exceeds student growth.



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2022

Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA)

Final Report

Iceni Projects Limited on behalf of Coventry &
Warwickshire Local Authorities

November 2022

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ICENI PROJECTS LIMITED
ON BEHALF OF COVENTRY
& WARWICKSHIRE LOCAL
AUTHORITIES

Coventry & Warwickshire Housing &
Economic Development Needs
Assessment (HEDNA)
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1. INTRODUCTION

- 1.1 The local planning authorities in Coventry and Warwickshire¹ have a history of working together to address strategic planning matters and have commissioned this Housing and Economic Development Needs Assessment (HEDNA) to inform the preparation and review of local plans within the sub-region.

What is the HEDNA?

- 1.2 The HEDNA is intended to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land. It considers the scale of overall housing need, the need for different types of homes, dynamics within different sectors of the housing market and the specific housing needs of different groups within the population. It considers economic dynamics and growth potential and provides an integrated evidence base regarding the need for employment land and premises to 2041 and 2050. The timeframes reflect the different plan periods which authorities in the sub-region are using, with the South Warwickshire Plan intended to look to 2050.
- 1.3 The HEDNA provides an assessment of need and is intended to inform part of the evidence base to inform the development of local plans. It will inform consideration of the scale and distribution of development within the sub-region, particularly post 2031², which is to be addressed through a new Memorandum of Understanding between the Coventry & Warwickshire (C&W) authorities.
- 1.4 The HEDNA has been prepared by a consultancy team led by the Economics Team at consultancy Icen Projects, supported by Cambridge Econometrics (in respect of economic forecasts), Holt Commercial (in respect of commercial property market dynamics), MDS Transmodal (in respect of warehousing and logistics needs) and Justin Gardner Consulting (JGC) (on demographics, affordable housing and specialist housing needs).

Study Requirements

- 1.5 Key requirements of the brief for the Study are:

¹ Coventry City Council, Rugby Borough Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Stratford-on-Avon District Council and Warwick District Council

² 2031 is the end point for the current round of adopted local plans in the sub-region

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- Reviewing the Housing Market Area (HMA) and Functional Economic Market Area (FEMA) geographies and considering dynamics that cut across county boundaries including relevant Duty to Cooperate issues;
 - Considering overall housing need within the Study area, having regard to the standard method, interrogation of demographic trends and other relevant considerations including economic growth potential;
 - Breaking down the overall housing need by type, tenure and size and providing an evidence base regarding the mix of housing needed. The HEDNA includes an updated assessment of affordable housing need and consideration of the need and policies for First Homes;
 - Considering the housing needs of specific household groups including students, families, older people, and others with specific housing needs; as well as appraising dynamics in particular market segments including the self- and custom-build housing and build-to-rent;
 - Reviewing economic dynamics and consideration of economic growth potential, including the potential of different economic sectors;
 - Appraising commercial property market dynamics and trends in the delivery and loss of employment of different types, including through permitted development;
 - Assessment of future needs for employment land to 2041 and 2050, including office and industrial floorspace, to inform plan preparation.

1.6 Updated evidence is needed to take account of changes in economic and housing market dynamics, national policy changes including the revised NPPF and introduction of the standard method for calculating housing need, and to provide up-to-date evidence base which can inform the progression or review of local plans, duty to cooperate conversations, and development management decisions on individual planning applications.

Housing and Functional Economic Market Areas

1.7 Previous research has defined Coventry and Warwickshire as a functional Housing Market Area³ and Functional Economic Market Area⁴ taking account of the functional relationships which exist across the sub-region. Icenis has sought to review whether these geographies hold true having regard to the latest data. The detailed analysis is set out in **Appendix A1**.

³ Coventry and Warwickshire Joint Strategic Housing Market Assessment, 2013

⁴ Warwickshire County Council 2010; Coventry Employment Land Review 2015

-
- 1.8 The evidence shows a strong set of commuting and migration relationships between the authorities in Coventry and Warwickshire, with 2011 Census data showing 71% of internal migration moves were contained within the sub-region, rising to 86% if long distance flows are excluded with 81% of residents both living and working within the area. Some distinction can be drawn between the characteristics in Coventry and the northern part of the sub-region which tends to have lower house prices and an economic structure which is more focused towards manufacturing, warehousing and logistics; whereas South Warwickshire has a more serviced-based economy and higher house prices. However Coventry plays an important role as an employment, retail, cultural and service centre for the wider sub-region and there are notable commuting flows between Coventry and the South Warwickshire authorities.
- 1.9 Whilst functional geographies do not in reality precisely fit onto local authority boundaries, Coventry and Warwickshire remains an appropriate ‘best fit’ Housing Market Area (HMA) and Functional Economic Market Area (FEMA). Inevitably functional market areas clearly do not precisely fit to local authority boundaries; and at the borders of any area HMA there are often links with the adjoining areas. Plan making activities should therefore continue to recognise overlaps in North Warwickshire and Stratford-on-Avon with the Birmingham HMA and FEMA; between Rugby and West Northamptonshire; and local links across the A5 with Hinckley and Bosworth (which is in Leicestershire).

Report Structure

- 1.10 Initial work on preparing the HEDNA was undertaken in 2021. The project was however paused to reflect uncertainties associated with demographics, pending the release of data from the 2021 Census. The HEDNA report has then been finalised in Autumn 2022 with demographic analysis and modelling of housing need capturing initial Census data released on 28th June 2022.
- 1.11 The HEDNA report is structured as follows:

Part A: Understanding Dynamics

- Chapter 2: Economic Baseline;
- Chapter 3: Commercial Property Market Dynamics;
- Chapter 4: Housing Market Dynamics;

Part B: Considering Overall Development Needs

- Chapter 5: Demographic Dynamics & Overall Housing Need;
- Chapter 6: Economic Growth Potential;

-
- Chapter 7: Affordable Housing Need;

Part C: Considering Employment Land Needs

- Chapter 8: Employment Land Needs;
- Chapter 9: Strategic B8 Land Use Forecasting;
- Chapter 10: Drawing Conclusions on Employment Land Needs;

Part D: Mix of Homes Needed

- Chapter 11: Sizes and Types of Homes Needed;
- Chapter 12: Specific Housing Market Segments;

1.12 A final section then sets out conclusions and recommendations. A separate Executive Summary has been prepared.

PART A: UNDERSTANDING DYNAMICS

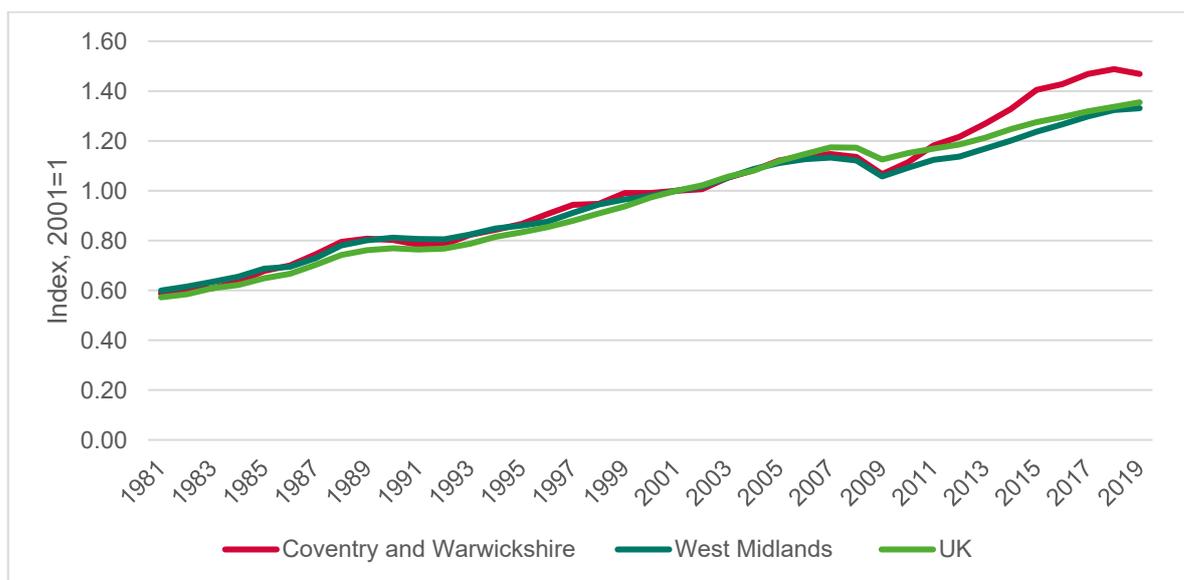
2. ECONOMIC BASELINE

2.1 This section of the report provides a profile of the sub-regional economy and its past performance and considers labour market dynamics. The analysis draws on a comprehensive economic dataset from Cambridge Econometrics Local Economy Forecasting Model (LEFM) dated March 2021. This includes data on employment and GVA, overall and by sector, from 1981-2019.

Economic Size and Structure

2.2 Coventry and Warwickshire is a £26 billion economy, accounting for 19% of West Midlands GVA. As the analysis below shows, growth in GVA has slightly out-performed regional and national trends with growth of 47% achieved between 2001-19 compared to 33% and 35% at a regional and national level. This in particular reflects stronger performance over the period since 2013.

Figure 2.1: Historical GVA Growth



Source: Icen analysis of CE data

2.3 An analysis of the contribution to GVA of different sectors points to the important role of the manufacturing sector, which accounts for 18.2% of GVA; to wholesale, transport and warehousing and postal activities, which account for 10.6% of GVA; and to the education sector which accounts for 6.5% of GVA. Overall the service sector accounts for around 59% of total GVA.

2.4 Over the period since 2001, manufacturing GVA has grown (by 46%, an average of 2.1% pa) with service sector activities similarly driving growth in the sub-regional economy. The sectors which have contributed most strongly to GVA growth are shown below. This includes both sectors associated with offices and warehousing, together with utilities, construction, health and education.

Table 2.1 Sectors driving growth in GVA, 2001-19

	GVA 2001 £ million	GVA Growth 2001-19 £ million	% Growth	% CAGR
Electricity & gas	457.72	1306.05	285%	7.8%
Agriculture, forestry & fishing	94.255	46.511	49.3%	2.3%
Pharmaceuticals	8.088	21.765	269.1%	7.5%
Motor vehicles	1247.402	1701.660	136.4%	4.9%
Other transport equipment	152.091	434.216	285.5%	7.8%
Water, sewerage and waste	241.358	353.934	146.6%	5.1%
Motor vehicles trade	461.410	348.337	75.5%	3.2%
Air transport	2.863	3.116	110.6%	4.2%
Warehousing & postal	485.419	608.886	125.4%	4.6%
I.T services	546.126	707.088	129.5%	4.7%
Head offices & management consultancies	159.622	384.130	240.7%	7.0%
Architectural & engineering services	267.721	244.425	91.3%	3.7%
Health	614.872	408.190	66.4%	2.9%

Source: Icen analysis of CE data

- 2.5 Coventry City has the largest economy within the sub-region, accounting for a third of its total GVA. Warwick makes a sizable contribution (22%), while Stratford-on-Avon (16%) the third largest. In comparison the size of the economies in Rugby (11%) and North Warwickshire (10%) and Nuneaton and Bedworth (7%) are smaller.
- 2.6 Warwick, Stratford-on-Avon and Nuneaton and Bedworth have seen the strongest comparative growth in GVA over the period since 2001, with growth rates in these authorities exceeding regional/national averages and driving the sub-region's overall performance. In contrast, growth has been weaker and notably below average in Rugby and Coventry. The strongest recent growth (post 2011) has been in Nuneaton and Bedworth and Stratford-on-Avon. Most authorities in the sub-region, with the exception of Rugby, have out-performed national growth rates.

Table 2.2 GVA Growth by C&W Authority

	2019 Share of GVA	GVA Growth, 2001-19 CAGR	GVA Growth, 2011-19 CAGR
North Warwickshire	10%	2.2%	3.5%
Nuneaton and Bedworth	7%	2.8%	4.0%
Rugby	11%	1.5%	1.1%
Stratford-on-Avon	16%	2.9%	3.7%
Warwick	22%	3.1%	3.5%
Coventry	33%	1.4%	2.0%
C&W		2.2%	2.8%
West Midlands		1.6%	2.1%
UK		1.7%	1.9%

Source: Icen analysis of CE data

- 2.7 Almost three quarters (72%) of growth in GVA over the 2011-19 period has been focused in Coventry, Stratford-on-Avon and Warwick; with Warwick alone accounting for 27%. Relative to the workforce distribution, growth has been stronger in Warwick and Stratford-on-Avon in particular (but weaker in Nuneaton and Bedworth).
- 2.8 Estimated GVA per job, as a measure of the relative productivity of the economy, sits between the regional and national averages. It is 6% below the UK average across Coventry and Warwickshire – although this is skewed by London’s role as a global City. It is however 8% above the West Midlands average.
- 2.9 Within the sub-region, the highest productivity performance appears to be in Warwick and Stratford-on-Avon– those areas which have seen the strongest recent relative growth. Nuneaton and Bedworth is the only authority below the regional average, and by a substantial margin.

Table 2.3 Productivity - GVA per Job

	GVA, £m 2018	Total Employment ('000s), 2018	GVA per Job
North Warwickshire	2796	54.6	£51,248
Nuneaton and Bedworth	1972	53.6	£36,757
Rugby	2830	52.9	£53,520
Stratford-on-Avon	4494	81.7	£54,977
Warwick	5854	101.1	£57,882
Coventry	8924	178.9	£49,877
C&W Total	26869	522.9	£51,388
West Midlands	141470	2969.7	£47,637
UK	1910247	34948.0	£54,660

Source: Icen analysis of CE data

- 2.10 Total employment in 2019 across Coventry and Warwickshire is estimated at 526,900 jobs. Manufacturing is the largest sector in employment terms, accommodating 58,000 jobs. The next largest sectors are education and professional services. There will invariably have been some impact of Covid-19 on total employment between 2019-20 with a subsequent recovery. ONS Jobs Density data points to a reduction of around 9,000 jobs 2019-20, equating to a reduction in employment of -1.7%.
- 2.11 More recent local data is not available but at the regional level, the evidence shows that the ground lost through the pandemic has now been regained with total workforce jobs in June 2022 which is 0.5% greater than that in June 2019 prior to the Covid-19 pandemic.⁵
- 2.12 A location quotient analysis has been used to assess the relative representation of sectors relative to that seen across the West Midlands region and UK.
- 2.13 The sectoral structure across Coventry and Warwickshire is relatively similar to that seen more widely across the region, with a slightly greater proportion of employment in education and professional services.
- 2.14 Relative to the structure of the economy nationally, a strong concentration of employment in manufacturing is evident (LQ 1.8) as well as activities associated with warehousing/logistics (such as wholesale trade, warehousing and postal). There is a slightly higher representation of education employment – which is likely to be influenced by the presence of the two universities. The universities play an important role in the manufacturing ecosystem. There is also a strength in utilities, albeit that actual job numbers are modest. Motor vehicles trade (as separate from manufacturing) is another strong employment area for the sub-region.

⁵ ONS Workforce Jobs dataset

Table 2.4 Employment Structure and LQ Analysis – Coventry & Warwickshire, 2019

	C&W Total ('000s)	% Jobs	LQ vs WM	LQ vs UK
Manufacturing	58.0	11.0%	1.1	1.8
Education	46.6	8.8%	1.1	1.1
Professional services	45.8	8.7%	1.2	1.0
Business support services	43.6	8.3%	0.9	1.0
Retail trade	38.3	7.3%	0.9	0.8
Accommodation & food	32.6	6.2%	1.0	0.9
Construction	31.7	6.0%	0.8	0.9
Health	30.5	5.8%	0.8	0.8
Residential and social	24.4	4.6%	0.9	0.9
Wholesale trade	24.3	4.6%	1.0	1.3
Warehousing and postal	23.5	4.5%	1.3	1.9
Public administration	17.6	3.3%	1.0	0.8
Motor vehicles trade	16.6	3.2%	1.2	1.7
Art and rec	15.4	2.9%	1.0	0.7
Other services	15.1	2.9%	1.1	1.0
Transport	13.9	2.6%	0.9	1.0
I.T services	13.8	2.6%	1.2	0.8
Financial & insurance	11.9	2.3%	1.0	0.7
Public utilities	10.9	2.1%	1.9	2.0
Real Estate	7.0	1.3%	0.8	0.8
Agriculture & mining	5.4	1.0%	0.8	0.8
Total	526.9	100.0%	1.0	1.0

Source: Icen analysis of CE data

- 2.15 The sectoral structure points to the influence of the history of manufacturing activity in the sub-region; together with a comparative advantage derived from its central location within the UK and accessibility across the country by road and rail. These factors underpin its strength as a manufacturing and distribution location.
- 2.16 The universities are also an important economic asset and potential hubs of innovation; with other major assets including the Manufacturing Technology Centre, The Proving Factory, JLR Whitley (its Global HQ), JLR Gaydon and Horiba Mira as a focus for automotive R&D activity which have attracted a number of UK-leading companies.
- 2.17 We next consider further the structure of the manufacturing sector. Manufacturing activity is spread across a range of sectors and activities, however, it is clear that the motor vehicles industry in particular drives the manufacturing sector within the sub-region; which is evidently part of a wider regional cluster. The three largest manufacturing sub-sectors are Motor vehicles; Other transport equipment; and Machinery, as Table 2.5 shows. In contrast to other parts of the Midlands, there isn't a significant concentration of employment in Wood & paper; whilst pharmaceutical manufacturing is not strongly represented at a Warwickshire level.

2.18 The analysis points to some higher value manufacturing activities, such as machinery, in which there is a reasonable representation. However in contrast, employment and GVA in some notably higher value activities such as electronics, chemicals and pharmaceuticals is less strong. A number of the key manufacturing sub-sectors such as machinery and metals & metal products are reasonably lower value; albeit within a context in which productivity per job across the range of manufacturing sub-sectors is generally higher than many service sector activities emphasising the value in seeking to support/protect manufacturing jobs.

Table 2.5 GVA and Employment in Manufacturing Sub-Sectors

	GVA 2019 (£ million)	Employment 2019 (000s)	GVA per Job
Motor vehicles	2949.1	22.3	£132,280
Other transport equipment	586.3	1.7	£340,678
Machinery	488.6	6.1	£79,488
Metals & metal products	230.3	8.5	£27,193
Non-metallic mineral products	214.4	5.4	£39,949
Other manufacturing & repair	189.4	4.1	£45,959
Food, drink & tobacco	170.9	3.9	£44,157
Electrical equipment	116.1	1.4	£84,177
Electronics	108.4	1.0	£108,597
Textiles etc	51.4	0.9	£55,024
Chemicals	37.2	0.5	£73,874
Wood & paper	35.8	0.9	£37,893
Printing & recording	34.5	0.8	£45,401
Pharmaceuticals	29.9	0.5	£57,742

Source: Icen analysis of CE data

2.19 Table 2.6 below shows the structure of employment by LA district. We have highlighted those sectors in which there is a particular specialism, showing in light orange those with a LQ of between 1.5 – 1.9, and in dark orange those with a LQ of over 2.0.

2.20 Manufacturing is strong across the sub-region but is particularly strongly represented in Stratford-on-Avon (influenced by Gaydon in particular) and North Warwickshire. Transport and warehousing and postal activities are represented across a number of authorities (beyond Coventry), with particular concentrations in North Warwickshire and Rugby influenced by the strong accessibility of locations to the strategic road network and major sites such as Hams Hall and Birch Coppice in North Warwickshire; and the Swift Valley Industrial Estate, Central Park, Rugby Gateway and Prologis Ryton in Rugby Borough.

Table 2.6 Sectoral Structure by District/Borough, 2019

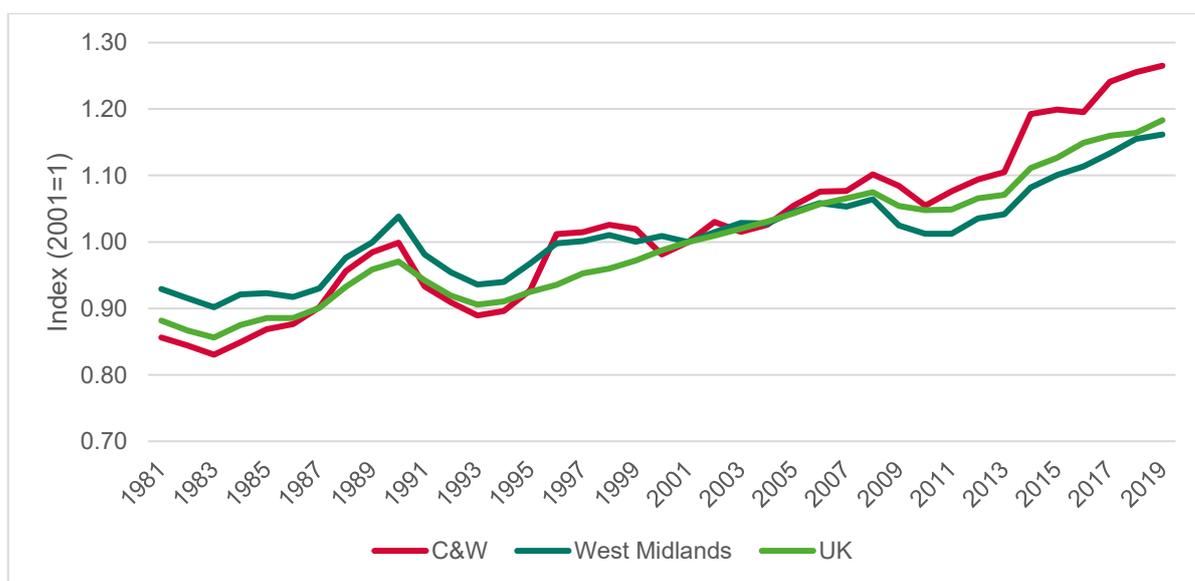
	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry	C&W Total
Total Jobs ('000s), 2019	53.9	54.8	55.8	85.2	98.1	179.1	526.9
Manufacturing	13.4%	11.2%	9.8%	16.1%	6.7%	10.6%	11.0%
Health & care	4.3%	15.0%	8.2%	9.5%	10.3%	12.1%	10.4%
Education	4.8%	8.4%	8.6%	6.2%	6.0%	13.1%	8.8%
Professional services	9.1%	5.9%	9.8%	8.8%	11.3%	7.6%	8.7%
Retail trade	9.5%	8.4%	7.2%	6.7%	6.5%	7.0%	7.3%
Business support services	7.6%	7.9%	8.8%	6.3%	7.6%	9.7%	8.3%
Construction	8.3%	7.1%	7.5%	6.6%	5.4%	4.6%	6.0%
Wholesale trade	5.2%	4.8%	3.8%	4.0%	5.8%	4.3%	4.6%
Accommodation & food	6.9%	4.7%	6.8%	8.7%	6.6%	4.8%	6.2%
Public Administration & Defence	0.9%	4.7%	2.6%	1.5%	5.3%	3.7%	3.3%
Warehousing & postal	12.1%	4.4%	8.2%	2.6%	3.3%	2.5%	4.4%
Other Services	1.6%	2.2%	2.3%	2.7%	5.1%	2.6%	2.9%
ICT	1.9%	1.6%	3.3%	2.9%	5.1%	2.6%	3.0%
Arts & rec.	1.4%	2.6%	2.3%	3.9%	2.7%	2.1%	2.5%
Transport	4.4%	3.8%	4.1%	2.1%	1.9%	2.0%	2.6%
Financial & insurance	0.6%	1.5%	1.8%	3.4%	1.3%	3.1%	2.3%
Motor vehicles trade	5.5%	2.8%	2.4%	2.9%	3.0%	3.0%	3.2%
Utilities	0.6%	1.7%	0.4%	0.2%	4.1%	2.9%	2.1%
Real estate	0.7%	0.8%	1.2%	2.0%	1.4%	1.3%	1.3%
Agriculture, mining	1.1%	0.6%	1.1%	2.8%	0.7%	0.4%	1.0%

Source: Icen analysis of CE data

2.21 It is notable that the concentration of utilities employment is particularly driven by employment in Warwick. This is likely to be influenced by the presence of a selected number of businesses in the sector within the District, such as National Grid at Warwick Technology Park. Agricultural activities are strongly represented in the more rural district of Stratford-on-Avon; albeit this overall is a relatively small sector in respect of overall employment. We also see a strong representation of arts and recreational and accommodation and good employment reflecting Stratford-upon-Avon's tourism draw. Leamington Spa has been a growing centre for gaming with evidence pointing to research pointing to a cluster of gaming companies, employing near to 1000 people in 2021.⁶

2.22 Prior to 1996, employment growth was comparatively weaker in Coventry & Warwickshire than across the region or nationally; notably with employment levels which remained fairly stable between 1996-2001. The sub-region then experienced a period of rapid economic growth between 2001-2008, but then a more notable drop in employment from 2009-2010 (with total employment indeed falling prior to the recession). Over the more recent period since 2011, the sub-region has seen particularly stronger employment growth and indeed has outperformed wider areas – seeing employment growth of 17.6% between 2011-19 compared to 12.8% across the UK and 14.7% across the West Midlands.

Figure 2.2: Employment Growth vs Wider Comparators



Source: Icen analysis of CE data

2.23 Overall between 2011-19 total employment increased by 78,700. The performance of individual districts within the sub-region has varied. Stratford-on-Avon and North Warwickshire have seen the strongest employment growth (consistent with the picture for GVA). In contrast total employment in Warwick is the only district with employment growth below that of the UK.

⁶ <https://www.businessinnovationmag.co.uk/leamington-spa-a-major-hub-for-the-uks-gaming-sector/>

Table 2.7 Employment Growth, 2011-19

000s	Employment, 2011	Employment, 2019	Change ('000s)	% Change
North Warwickshire	43.0	53.9	10.9	25.4%
Nuneaton and Bedworth	48.2	54.8	6.7	13.8%
Rugby	48.8	55.8	7.0	14.3%
Stratford-on-Avon	66.3	85.2	18.8	28.4%
Warwick	89.4	98.1	8.7	9.7%
Coventry	152.4	179.1	26.7	17.5%
C&W	448.1	526.9	78.744	17.6%
West Midlands	2602.8	2986.6	383.7	14.7%
UK	31486	35517.0	4031	12.8%

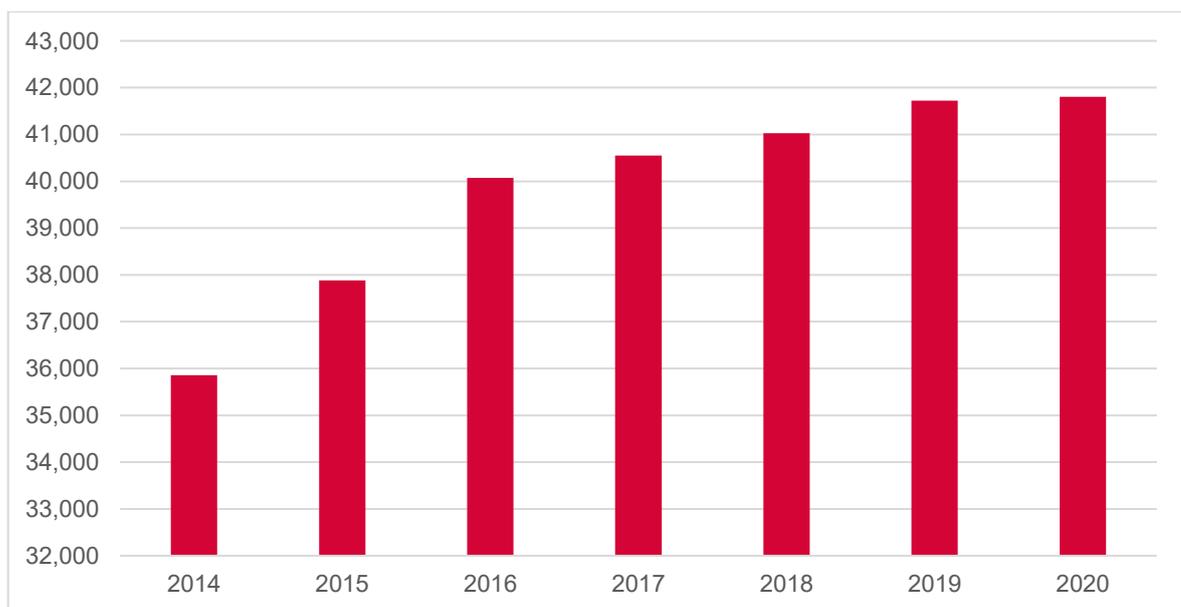
Source: Icen analysis of CE data

- 2.24 Research undertaken by Centre for Cities in 2017 based on HESA's destination of leavers survey for the period 2014-2015 shows that Coventry only retains 15 per cent of its university graduates, the fourth lowest among UK cities. Of the graduates from the University of Warwick only 6 per cent stay in Coventry. Coventry University does however have a much higher number of students attend who are originally from Coventry in comparison to the University of Warwick.

Business Base

- 2.25 The number of active enterprises in Coventry and Warwickshire grew by 17% between 2014-20, which was just under the national average (18%) and notably below the regional level (22%). As the table below shows, much of this growth was between 2014-16.

Figure 2.3: Active Enterprises – Coventry and Warwickshire



Source: ONS Business Demography Statistics

2.26 An assessment of the density of businesses, relative to the working-age resident population, shows the highest business densities are in Stratford-on-Avon and Warwick; albeit that the business density is also above regional average in most authorities with the exception of Nuneaton and Bedworth and Coventry.

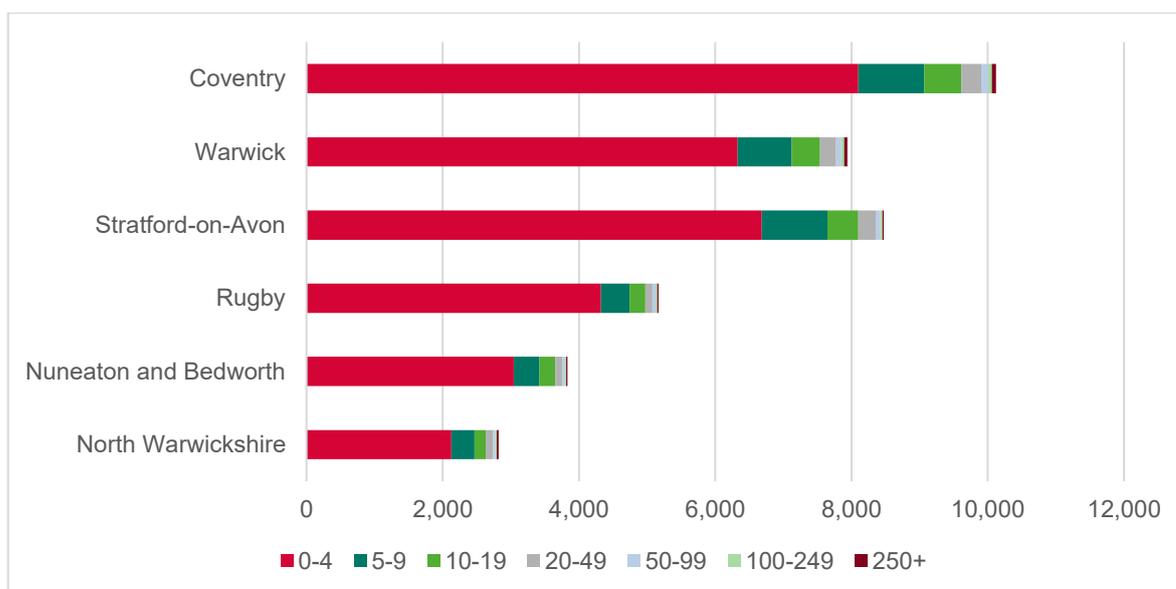
Table 2.8 Business Density, 2019

	Active Enterprises, 2019	Enterprises per 1000 Population 16-64
North Warwickshire	2,980	75
Nuneaton and Bedworth	4,330	54
Rugby	5,540	82
Stratford-on-Avon	8,520	111
Warwick	8,620	93
Coventry	11,735	46
C&W	41,725	62
West Midlands	240,365	65
UK	2,990,320	85

Source: Icen analysis of ONS Business Demography Statistics

2.27 Across the sub-region, 80% of businesses have less than 10 employees, and 99.6% are Small and Medium-Sized Enterprises with less than 250 employees. There are a total of 185 larger enterprises with 250+ staff of which 60 are in Coventry. The structure of the business base by size is broadly consistent with that across the wider region.

Figure 2.4: VAT or PAYE Enterprises by Size Band, 2020

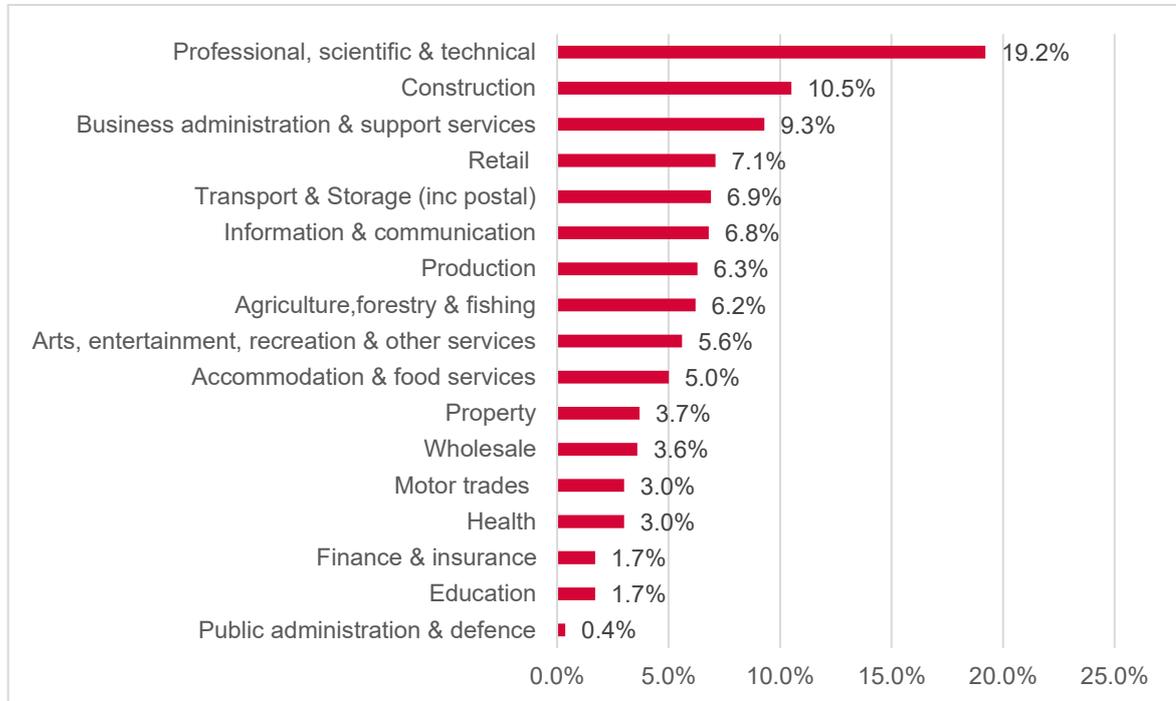


Source: Icen analysis of ONS / IDBR data

2.28 The structure of VAT and/or PAYE businesses by sector shows a particular relative concentration in motor trades, wholesale, property and education. ICT and construction are relatively under-

represented relative to the profile nationally, while conversely transport and storage, and professional, scientific and technical roles outperform the national profile.

Figure 2.5: Profile of VAT/PAYE Enterprises by Sector, Coventry & Warwickshire 2020



Source: Icen analysis of ONS / IDBR data

2.29 If we drill into the differences in structure between different local authorities, we find that construction businesses are strongly represented in North Warwickshire. Transport and storage are strongly represented in Rugby and Nuneaton and Bedworth. There is a concentration of businesses in the information and communication as well as professional, scientific and technical industries in Warwick, which will include those within the gaming sector, with the south of the county more orientated towards service-sector businesses. North Warwickshire clearly has a concentration of employment in warehousing and logistics, but this is focused in larger businesses.

Table 2.9 LQ Analysis of VAT/PAYE Businesses by Location, 2020

	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry	C&W	West Midlands	UK
Agriculture, forestry & fishing	1.2	0.2	1.0	1.6	0.4	2.8	1.1	1.0	1.0
Production	1.2	1.3	0.7	0.8	0.8	1.0	0.9	1.3	1.0
Construction	1.3	1.0	0.8	0.9	0.7	1.1	0.9	0.9	1.0
Motor trades	1.2	1.3	0.9	0.8	0.8	0.9	0.9	1.2	1.0
Wholesale	0.8	0.9	0.7	0.8	1.3	1.0	0.8	1.2	1.0
Retail	0.9	1.0	0.7	0.8	0.3	0.7	0.9	1.0	1.0
Transport & Storage (inc postal)	0.9	1.6	2.7	0.6	0.9	0.4	1.0	1.5	1.0
Accommodation & food services	1.0	0.9	0.7	0.9	1.7	0.9	0.9	1.0	1.0
Information & communication	0.8	1.0	1.3	1.0	1.1	0.7	1.2	0.7	1.0
Finance & insurance	0.9	1.0	0.9	1.1	4.1	1.1	1.0	0.7	1.0
Property	1.1	0.6	0.9	1.3	1.2	1.1	1.1	0.9	1.0
Professional, scientific & technical	0.9	0.9	1.2	1.5	1.8	1.1	1.4	0.8	1.0
Business administration & support services	0.9	1.0	0.7	0.8	0.9	0.7	0.8	1.3	1.0
Public administration & defence	1.7	0.4	1.2	2.1	1.0	1.9	1.4	1.1	1.0
Education	0.9	0.9	1.2	1.1	1.1	1.0	1.1	1.0	1.0
Health	0.6	0.8	0.6	0.7	0.9	0.7	0.7	1.1	1.0
Arts, entertainment, recreation & other services	0.9	1.0	0.9	1.1	1.0	1.1	1.0	0.9	1.0

Labour Market

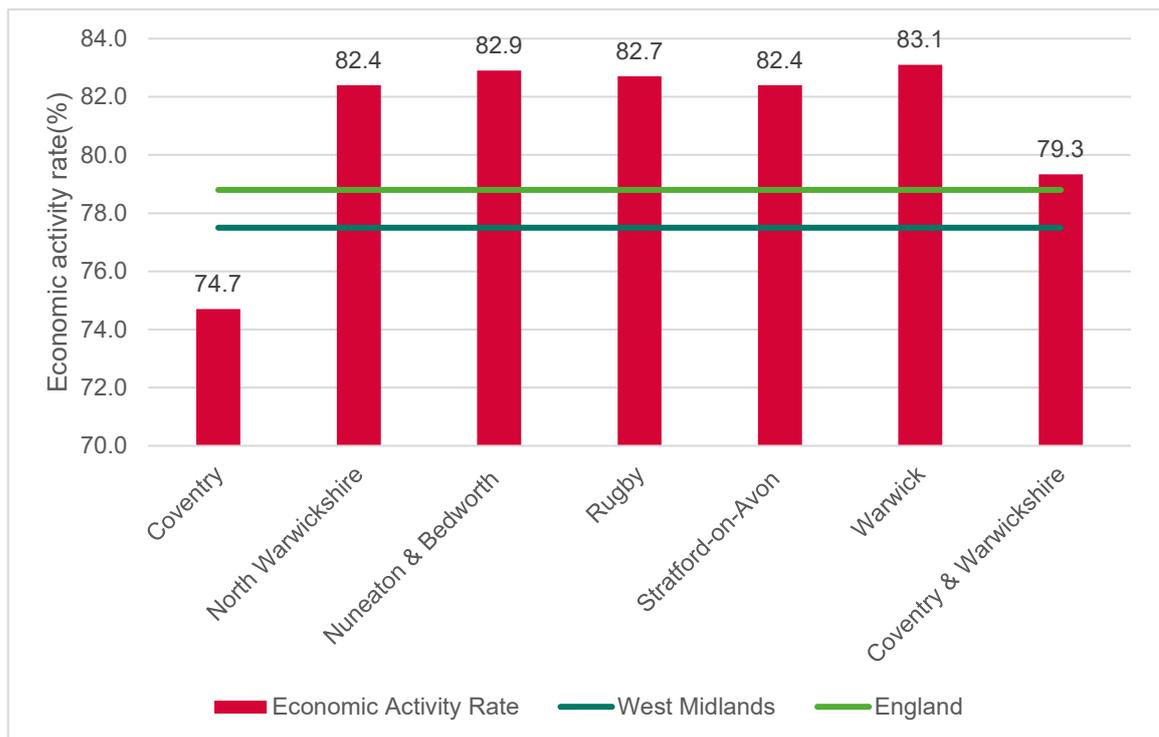
2.30 In this section we turn to assess labour market characteristics and performance, addressing issues associated with economic participation, skills and earnings.

Economic Participation

2.31 There are two key measures of economic participation: the economic activity rate which describes the percentage of the working-age population (aged 16-64) who are either working or looking for work; and the employment rate, which describes those within this age group who are in work.

2.32 The economic participation rate in the sub-region (79.3%) is marginally above the national rate (78.8%) but considerably stronger than the region (77.5%). Within the sub-region it is lower in Coventry by some margin (74.7%). In contrast stronger levels of economic participation are evident in all the Warwickshire local authorities.

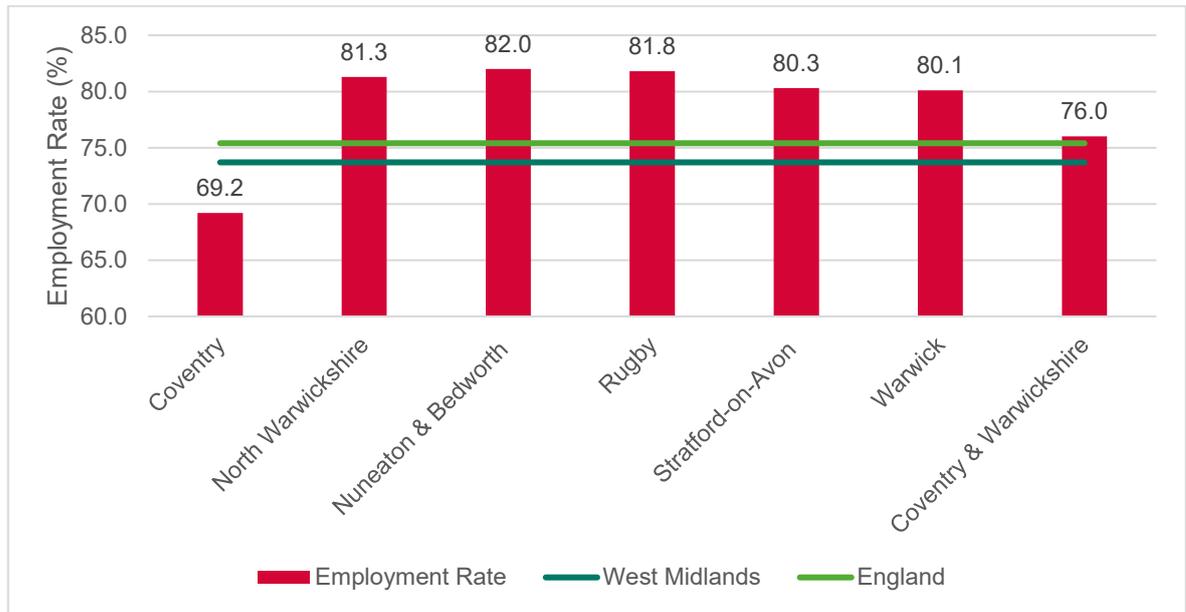
Figure 2.6: Economic Activity Rate (2021/22)



Source: Annual Population Survey (April 2021 – March 2022)

2.33 A similar picture is evident considering the employment rate, as shown in Figure 2.7. The employment rate across Coventry & Warwickshire (76.0%) is slightly higher than the national comparator (75.4%) and moderately higher than the region (73.7%). The employment rate is notably lower in Coventry than across Warwickshire.

Figure 2.7: Employment Rate (2021/22)



Source: Annual Population Survey (April 2021 – March 2022)

Unemployment

2.34 ONS model-based estimates of unemployment point to unemployment levels at 20,300 in 2020 (albeit that they will clearly have varied within the year), with a particular concentration of unemployment in Coventry which has 11,300 unemployed (50% of the C&W total). Coventry is the only authority where the unemployment rate is above the national average. The latest Annual Population Survey data (for the year to March 2022) has unemployment across the sub-region at 20,000. This appears to reflect in particular a concentration of unemployment in Coventry.

Table 2.10 ONS Modelled Unemployment, Jan-Dec 2020

	Unemployment, 2020	% 16-64	% C&W Distribution
North Warwickshire	1,300	4.0%	6%
Nuneaton and Bedworth	3,200	4.8%	14%
Rugby	2,200	4.0%	10%
Stratford-on-Avon	2,000	3.1%	9%
Warwick	2,500	3.1%	11%
Coventry	11,300	5.9%	50%
Coventry & Warwickshire	20,300	4.2%	100%
West Midlands		5.3%	
Great Britain		4.6%	

Source: NOMIS

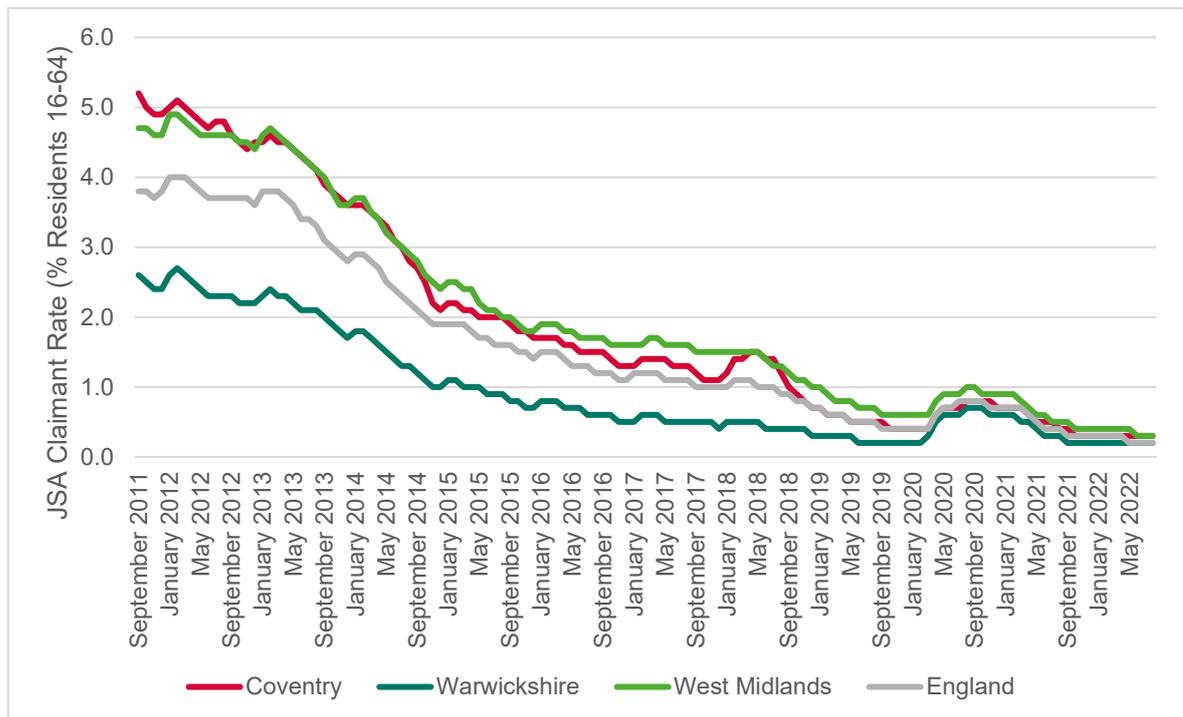
2.35 The ONS estimates above are modelled using Annual Population Survey data and based on a person's self-classification as being 'out of work' and 'currently and actively seeking to work'. The

claimant rate is an alternative indicator of unemployment which is measured as the number of people who are receiving benefits principally for the reason of being unemployed divided by the number of workforce jobs plus the claimant count. Whilst there is crossover between the claimant rate and the unemployment rate, they measure slightly different things, but both provide good indicators for actual levels of unemployment. Importantly the claimant count is published in a more timely manner and was available up to June 2021 at the time of writing.

2.36 Figure 2.8 below shows changes in claimant unemployment over time. Prior to the Covid-19 pandemic in 2019, the claimant rate in the Study Area was 0.4% in Coventry and 0.2% in Warwickshire (as a percentage of the resident population aged 16-64).

2.37 It can be seen that the claimant rate follows a similar pattern across all areas; with rising unemployment in 2020 influenced by the Covid-19 pandemic. It has however fallen in all areas: in Coventry it stands at 0.3% in August 2022 (consistent with the regional average), with a figure of 0.2% across Warwickshire (consistent with the national average). This represents conditions of near full employment.

Figure 2.8: Claimant Rate (June 2010 to June 2020)



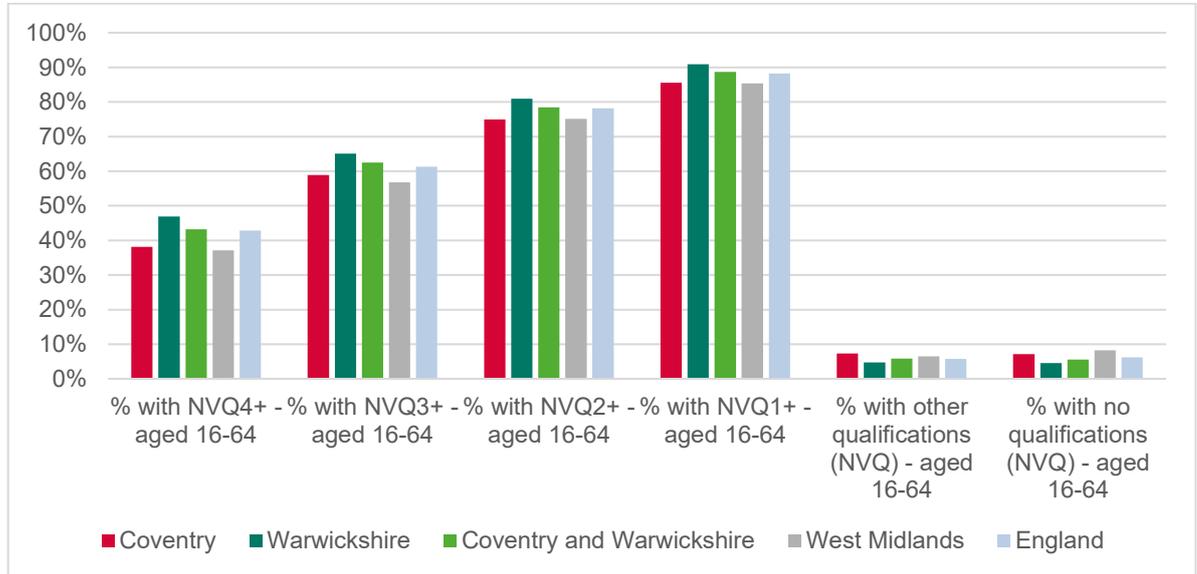
Source: ONS JSA Claimant Rate

Qualifications and Skills

2.38 The qualifications levels of the population indicate how employable the local workforce is. The percentage of the population with NVQ4+ (degree level) qualifications in the Study Area is slightly

above the West Midlands average but slightly below the English average. The percentage of Coventry and Warwickshire's population with no qualifications is below or the same as that of the comparator areas.

Figure 2.10: Qualifications (2020)



Source: Annual Population Survey

2.39 Drilling down to the position within individual local authorities, Warwick and Stratford-on-Avon have a greater concentration of higher level skills (NVQ4+), which equates to degree-level skills or equivalent. At the other end of the spectrum, Nuneaton and Bedworth has just 30% qualified to this level. Our analysis is based on data over the 2018-20 period to address small sample sizes in some areas.

Figure 2.11: % 16-64 qualified to NVQ4+ (2020)



Source: Annual Population Survey

- 2.40 The occupational split of the population provides an indication of where those working in higher paid/skilled jobs are living. The figure below shows the percentage of each area’s population in the top 3 occupational groups (Managers, directors and senior officials, Professional occupations, Associate prof & tech occupations). The highest proportions of these workers are seen in Warwick and Stratford-on-Avon (over 52%) contrasting with prevalence of just 43% in Coventry.
- 2.41 Warwickshire has slightly greater levels of employment in the top 3 occupational groups than England whereas Coventry is slightly below the regional average.

Figure 2.12: Employment in Top 3 Occupational Groups (2018-2020)

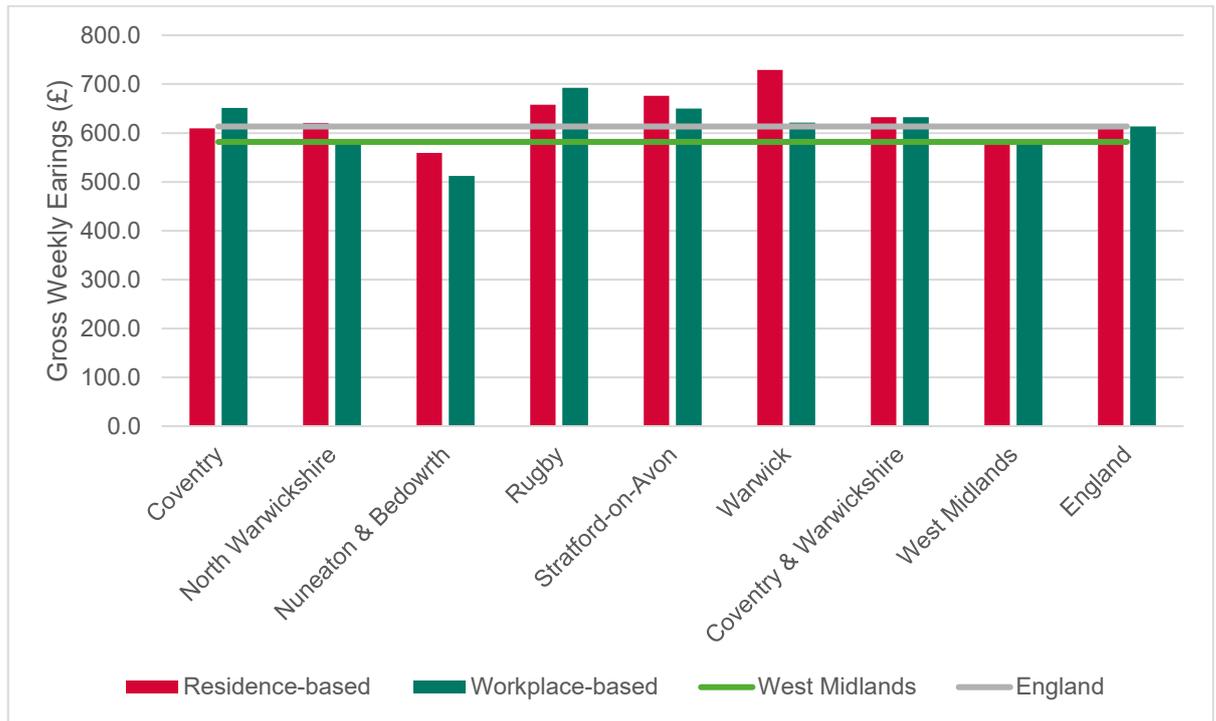


Source: Annual Population Survey

Earnings

- 2.42 Median workplace earnings provide an indication of the quality of the jobs available in an area. Median earnings for full-time jobs in Coventry and Warwickshire (£632 per week) are higher than the West Midlands (£582) and across England as a whole (£613). Median workplace earnings in Coventry (£652) are 12% above the regional and 6% above the national average. Stronger workplace earnings in Warwick and Coventry reflect a greater density of higher paid jobs in these areas.
- 2.43 Coventry and Rugby see higher earnings for those working in the authority than living in it, pointing to in-commuting of higher earners. The converse is true of most Warwickshire authorities, with particular significant differentials in Warwick followed by Nuneaton and Bedworth and North Warwickshire. Earnings of those working in Nuneaton and Bedworth are notably below wider benchmarks with gross weekly earnings of £513. Higher earnings are principally evident in those areas which see a greater concentration of higher paid jobs.

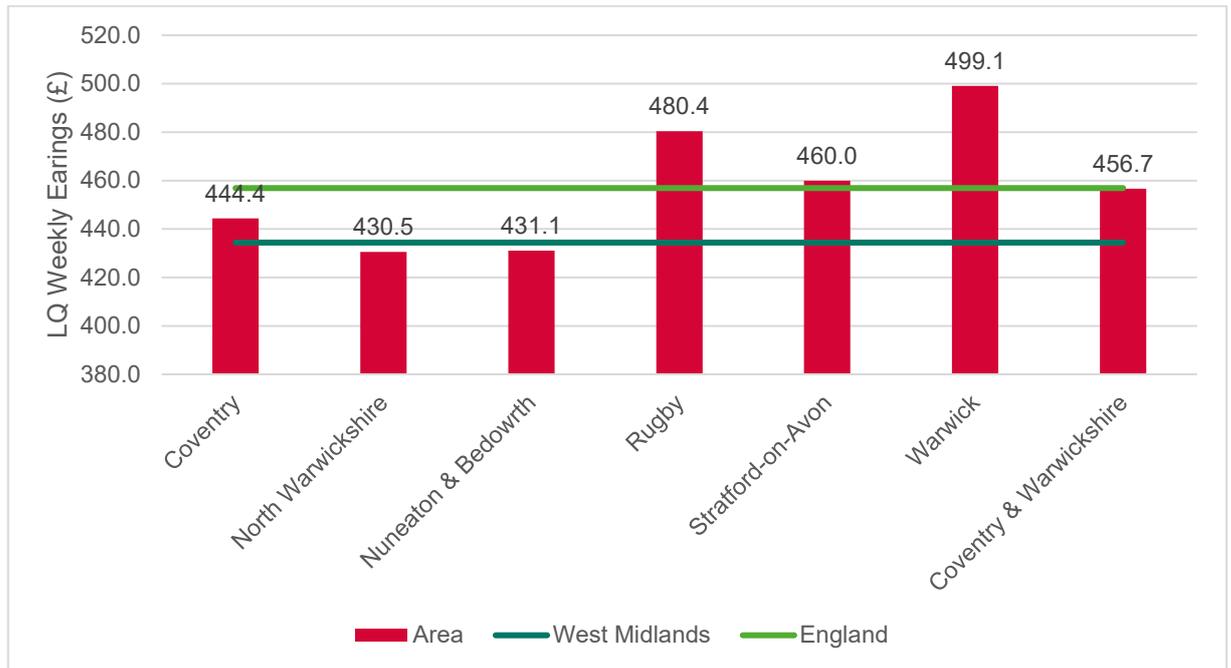
Figure 2.13: Comparison of Residence- and Workplace-based Earnings (2021)



Source: Annual Survey of Hours and Earnings

2.44 Lower quartile workplace earnings provide an indication of the quality of lower paid jobs and prevalence of lower paid jobs available in an area. Lower quartile workplace earnings in Warwickshire (£425) are higher than those across the West Midlands (£410) but lower than across England (£432). In Coventry lower quartile workplace earnings are £430 – higher than the West Midlands.

Figure 2.14: Lower Quartile Gross Weekly Workplace-based Earnings (2020)



Source: Annual Survey of Hours and Earnings

Summary and Key Points

- Coventry and Warwickshire is a £26bn economy and accommodated 526,900 jobs in 2019. It has grown relatively strongly since 2013 and whilst employment has been impacted by Covid-19 we have now seen the economy recover.
- Key sector strengths include manufacturing, which accommodates 58,000 jobs where Brexit is creating uncertainties; as well as warehousing/logistics, where demand is currently strong influenced by growth in e-retailing; and education. The manufacturing and higher education strengths, together with employment in ICT and professional and scientific sectors supports productivity which is above the regional average. There is however a particular concentration of lower paid jobs in Nuneaton and Bedworth which policy should seek to address.
- While 80% of businesses employ less than 10 people, business densities are significantly below the national average influenced in part by larger employers, but also potentially by entrepreneurial activity. There are strong concentrations of small businesses in professional,

scientific and technical activities, ICT and professional services – especially in Warwick District – and in construction.

- Economic participation levels are generally reasonable, at 80%, but lower in Coventry. As with many areas, the pandemic had resulted in growth in unemployment, which appears to remain persistently high in Coventry in particular. Overall labour market conditions are now tight. There are economic uncertainties in the short-term related to impacts of rising costs (inflationary pressures) in particular linked to rising energy costs, initiated by the war in the Ukraine.

3. COMMERCIAL PROPERTY MARKET DYNAMICS

- 3.1 This section provides an assessment of the commercial property market in Coventry and Warwickshire focused on offices (including office and R&D space) and industrial (including industrial and warehouse/ distribution space). The analysis uses the latest data at the time of its original preparation in mid 2021. We have included selected additional comments on more recent trends.
- 3.2 Valuation Office Agency (VOA) and Co-star data have been used to undertake the analysis below. It should be noted that both datasets have caveats and limitations. The VOA database has its own criteria for what is counted as office and industrial space which is different from that used by Co-star. Furthermore, Co-star does not capture all properties in a given area.

UK Office Market Overview

- 3.3 We first consider national office market dynamics over the last few years. Office markets across the UK demonstrated a level of resilience in 2019 set against a context of wider economic uncertainty linked to Brexit. Knight Frank's UK Cities Overview 2019 reports that leasing volumes finished the year 8% above the long-term trend as business change strategies continued to motivate space moves. Notably, despite concern derived from Britain's impending exit from the EU, foreign investment increased by 10% year-on-year to £1 billion representing 37% of total investment turnover.
- 3.4 Cushman and Wakefield reported that office take-up for the whole of 2020 was 7.7 million sqft – comparable to the year after the global financial crisis. During the second quarter, the UK-wide lockdown which saw most offices across the UK become temporarily closed, had a significant impact on take-up. Q2 2020 take-up therefore saw a 73% decrease from the five-year quarterly average. Whilst take-up remained below the long-term average in the second half of 2020, it did grow, particularly in Q4. Furthermore, in the final quarter of 2020, despite being 33% lower than Q4 2019, office investment turnover rose from the previous quarter signalling some growth in confidence in the sector with businesses sentiment indicating that the office remains important.
- 3.5 CBRE report that in the first quarter of 2021 office take-up was 75% down on the same period in 2020. Furthermore, in the 12 month office take up to Q1 2021 was the lowest on record since 2004 – reflecting the impact of the pandemic over a full year. Office availability increased by 7% over the quarter, reaching 23% above Q1 2020. Savills reported that despite decreased take-up on previous years in Q1 2021, there has been a significant increase since the lowest point in the pandemic (Q2 2020) – over 200% in regional office markets (i.e. beyond London). This demonstrates that regional

office markets are in the process of recovery. Furthermore, despite economic uncertainty, rental growth of prime office space continued to grow in almost all regional markets.

- 3.6 The evidence is that the pandemic is resulting in a continuing shift towards more flexible working patterns with increasing numbers of people working at least part of the time from home; but offices remain important in companies' culture, the work community, interaction between colleagues and training. The longer-term more structural trend may be of reduced space requirements as more office workers spend at least part of the week at home; and the market has been seeing occupiers reducing their office footprint on lease events. Alongside this we are seeing a 'flight to quality' with demand remaining for better quality 'Grade A' stock..

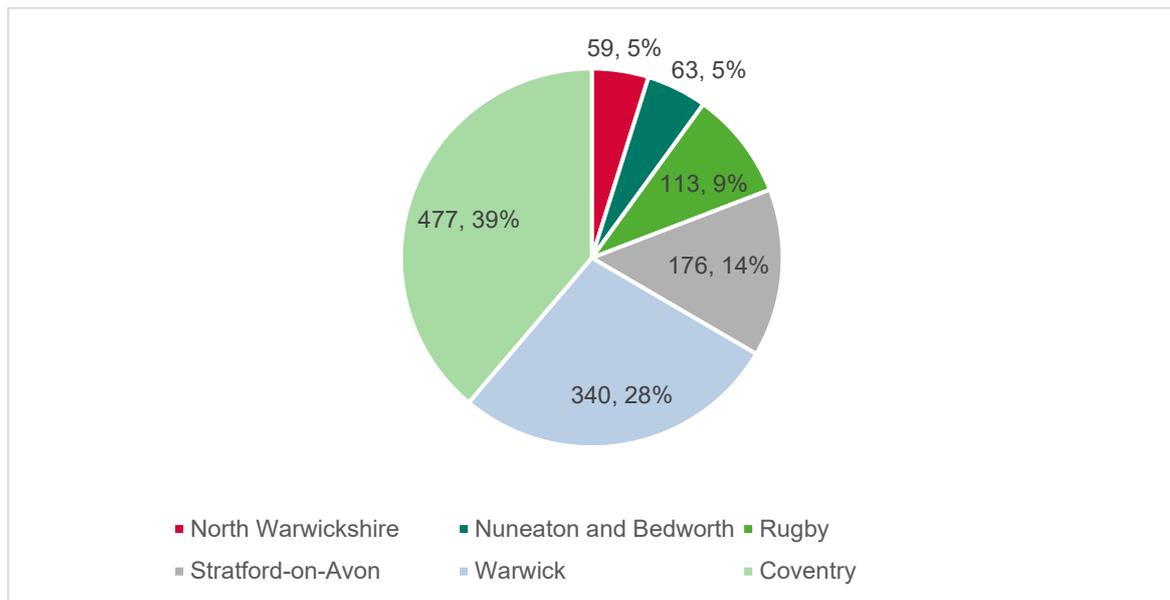
Coventry and Warwickshire Office Market

Office Stock

- 3.7 The VOA⁷ provides information on the number of rateable office properties by administrative area for the period between 2001 and 2020. There were 5,440 office properties in 2020 providing 1,228,000 sqm of office floorspace in total across Coventry and Warwickshire. This represents 18.7% of the office floorspace across the West Midlands. This suggests that the Study Area has a relatively large office sector given its working age population makes up 16.2% of that of the West Midlands.
- 3.8 Coventry supports a large proportion of the Study Area's office stock (39%) at 477,000 sq.m followed by Warwick (28%) with 340,000 sqm. On the other hand, floorspace in North Warwickshire and Nuneaton and Bedworth makes up just 10% of the Study Area's office floorspace.

⁷ VOA: Non-domestic rating: stock of properties including business floorspace, 2019/20

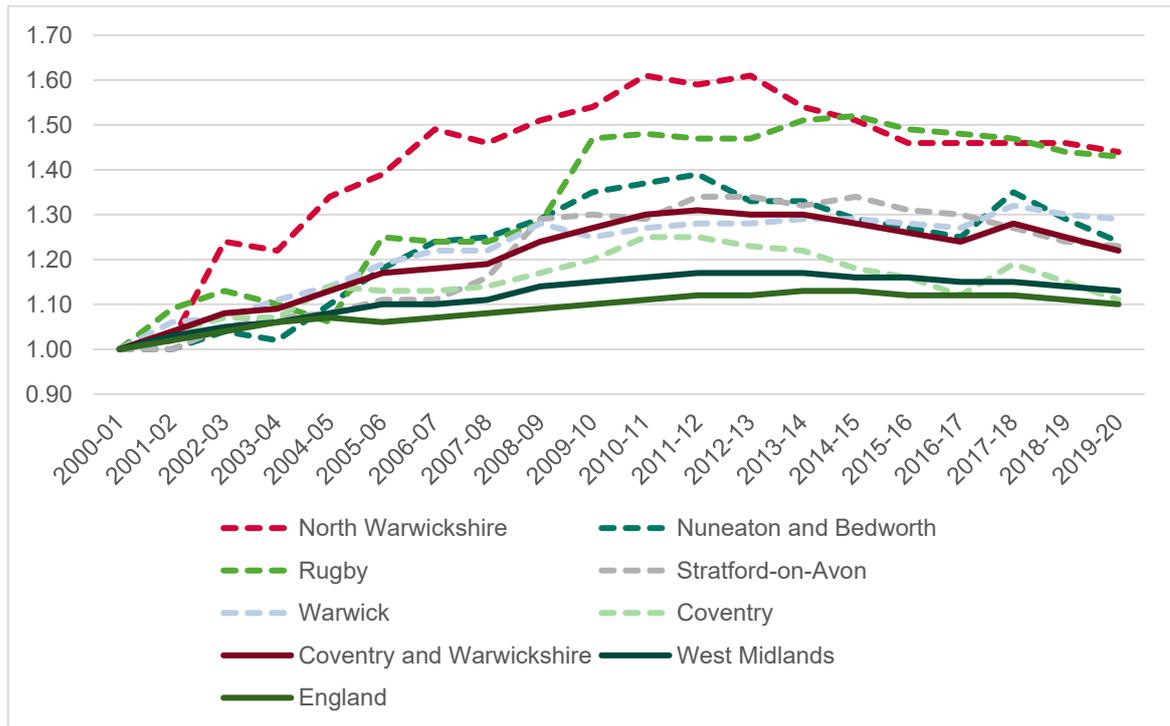
Figure 3.1: Office Floorspace by Authority Area 2019/20 (Thousands of sqm; %)



Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

- 3.9 The main office markets are Coventry and Leamington/Warwick, accounting for over half the office space in the sub-region, followed by Stratford-upon-Avon.
- 3.10 The figure below shows the change in total office floorspace by location between 2000 and 2020. It shows that over the last 20 years the total office floorspace across Coventry and Warwickshire has increased at a greater rate than the West Midlands and England as a whole (21.9% compared to 12.8% and 10% respectively). Office floorspace growth across North Warwickshire and Rugby has been even greater (43.9% and 43% respectively). On the other hand, growth across Coventry was lower than the average for the study area – roughly in line with the regional and national values at 11.2%.
- 3.11 Whilst 20 year growth has exceeded that which has occurred regionally and nationally, the quantum of office floorspace peaked in 2012. The decline in office floorspace over the last 10 years has been greater in Coventry and Warwickshire than across the West Midlands and England as a whole (-6.5% compared to -2.4% and -1% respectively).

Figure 3.2: Indexed Office Floorspace by Local Authority 2010/11 - 2019/20



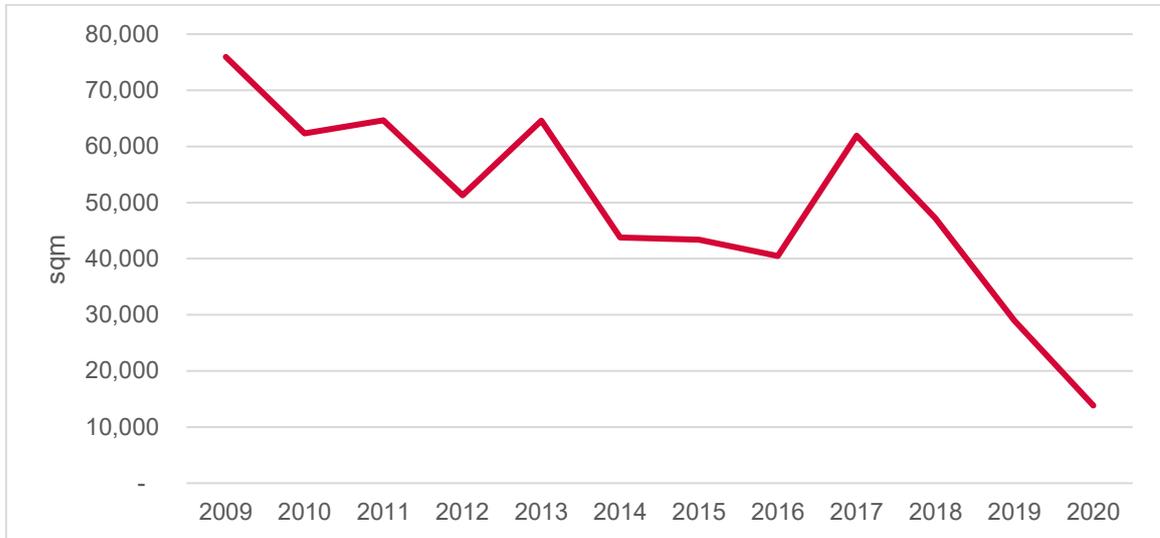
Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

Absorption, Delivery and Vacancy Trends

- 3.12 Gross absorption is the amount of space which has become physically occupied (moved in to). It provides an indication of the strength of the market but does not take into account the amount of space vacated and hence is not a measure of new demand.

- 3.13 The figure below shows that gross absorption decreased across Coventry and Warwickshire between 2009 and 2020. This occurred at a greater rate since 2017. The evidence thus points to a relatively sustained decline in the scale of office take-up.

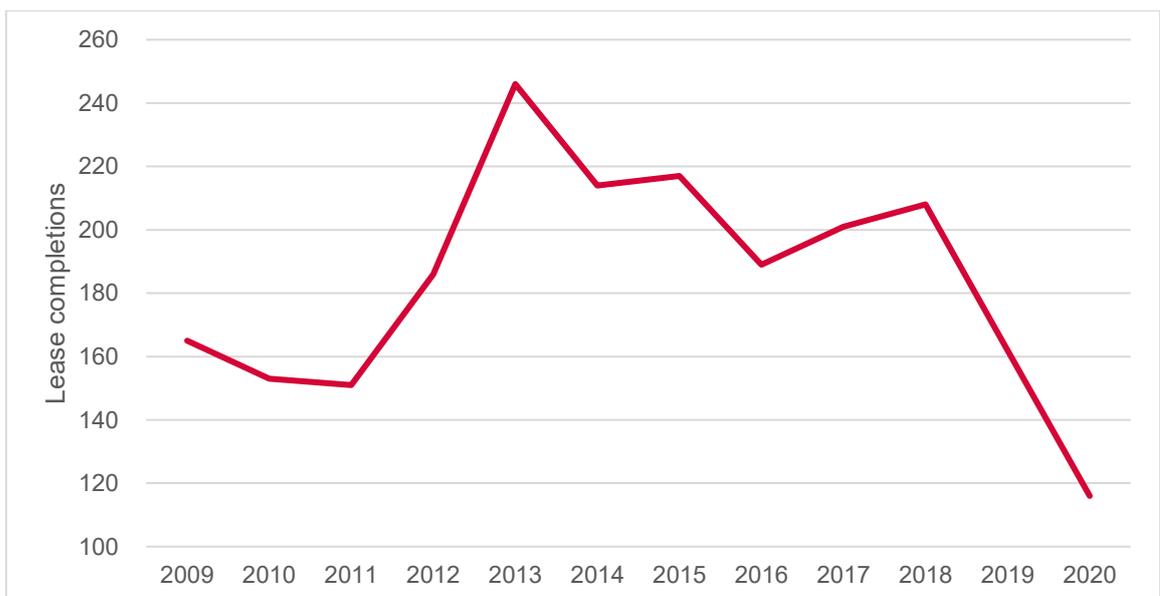
Figure 3.3: Gross Absorption of Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.14 To supplement gross absorption data (amount of space moved in to), lease completions (number of properties leased) data has also been analysed to help paint a picture of demand for office space without taking into account the size of leases/move ins. The figure below shows that unlike for gross absorption, lease completions actually went up between 2009 and 2013 indicating an increased demand for space. However, since then lease completions have fallen in a similar manner to gross absorption.

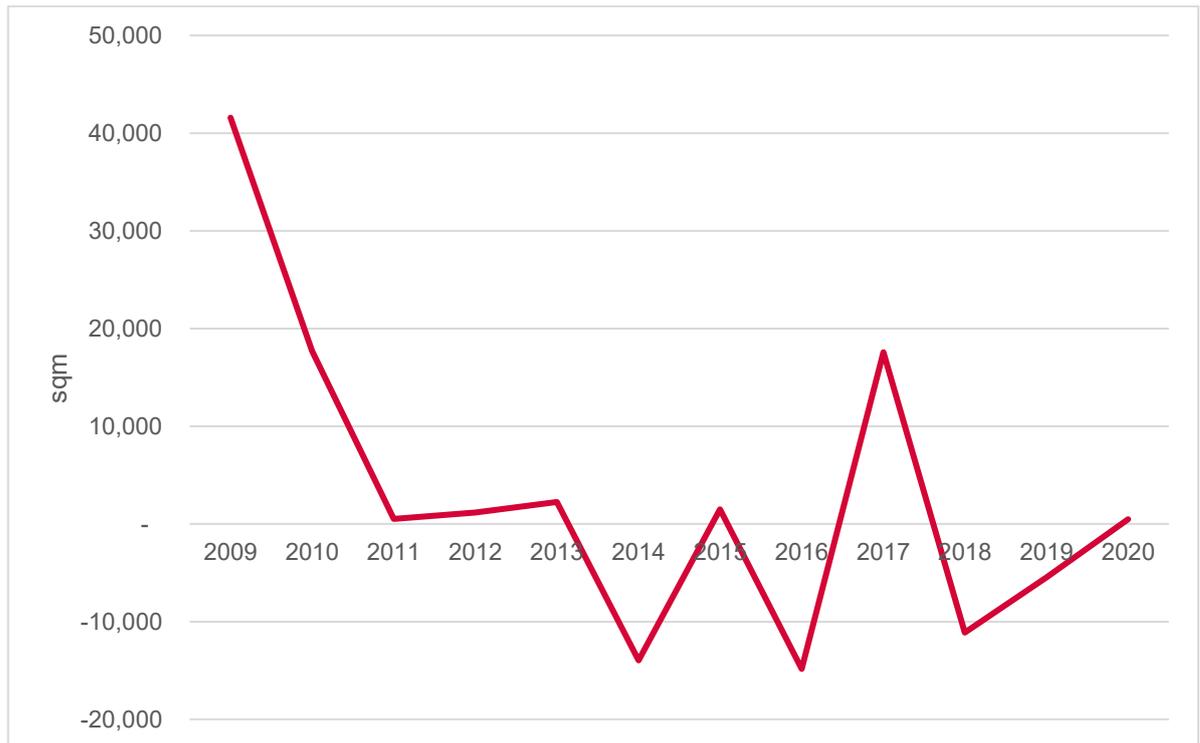
Figure 3.4: Lease Completions for Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.15 There was around 37,000 sqm of net new office floorspace delivered between 2009 and 2020. However, as can be seen in the figure below, *net* deliveries (the balance between new-build construction and losses) have been varied greatly over this period with a peak of 42,000 sqm in 2009 to a trough of -15,000 sqm in 2016. Over the 2010-20 period as a whole, there was a greater proportion of office space lost than built, resulting (based on CoStar data) in a modest reduction of just over 4,000 sq.m in the sub-region's office stock.

Figure 3.5: Net Deliveries of Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.16 CoStar provides data on net absorption which describes the net change in physically available space which is calculated by deducting the space vacated by tenants and made physically available within the local market from the total space which becomes physically occupied and is lost (e.g. through demolition). Therefore, net absorption indicates that net change in demand relative to supply of space. A positive net absorption figure means that the proportion of vacant space is falling, whilst a negative level indicates that more space was coming onto the market than being taken-up/lost.

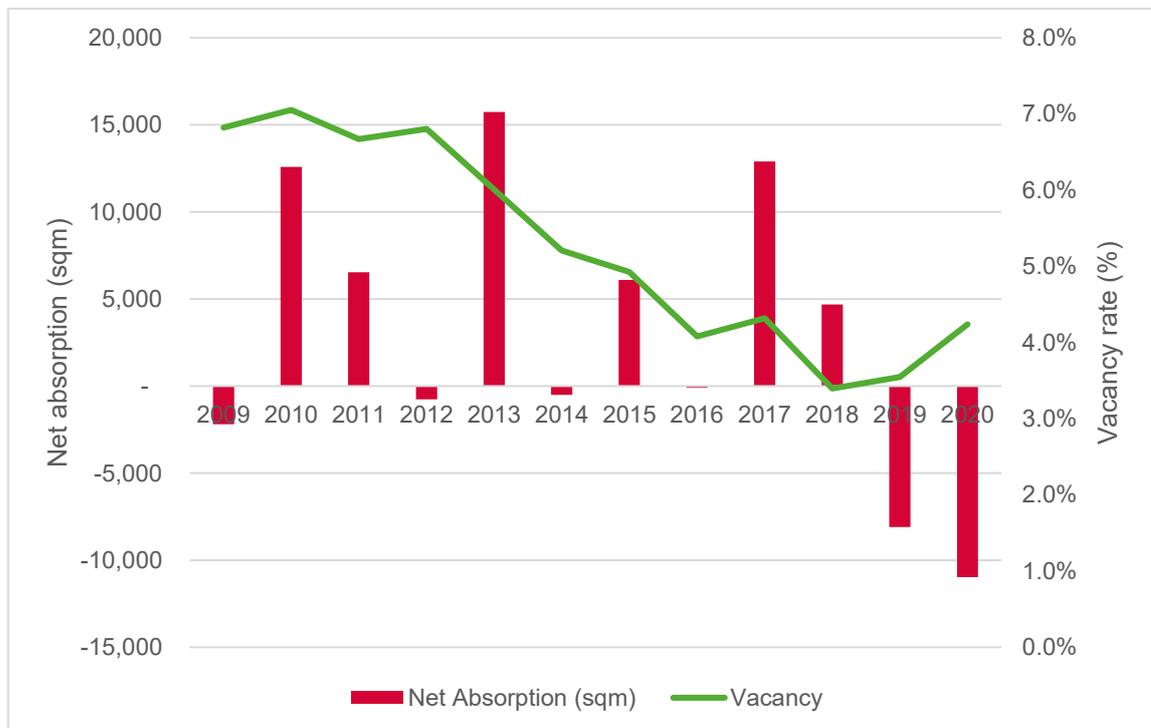
3.17 The figure below shows absolute net absorption and vacancy rates across Coventry and Warwickshire between 2009 and 2020. It can be seen that between 2009 and 2018, net absorption was generally positive resulting in a sustained drop in the level of vacant office floorspace to levels

well below that which might be expected in a functioning market.⁸ However, in 2019 and 2020 net absorption was negative at -87,000 sqm and -118,000 sqm.

3.18 Over the period between 2009 and 2020 there was an overall net absorption of around 36,000 sqm of floorspace. This suggests strong demand relative to the supply of office floorspace. This has arisen through a combination of take-up of space by businesses and declining stock (such as through losses/conversion of office space).

3.19 Since 2009, this positive net absorption rate has led to a declining vacancy rate – from 6.8% in 2009 to 3.4% in 2018. However, since 2018 the vacancy rate has risen slightly as more stock comes onto the market than is taken-up.

Figure 3.6: Net Absorption and Vacancy of Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

Vacancy and Rents by Authority Area

3.20 To understand the relative strength of the office market between the authority areas within Coventry and Warwickshire, 2019 and 2021 vacancy rates and rental prices have been gathered and are presented in the table below. Comparing between the 2019 and 2020 vacancy rates provides an

⁸ Some vacant space is required to facilitate moves within a functioning market – typically 7.5%

indication of the impact of Covid-19. Coventry has been broken into Coventry Central (the City Centre) and Coventry Fringe given the significant differences in the office markets of these two areas.

Table 3.1 Vacancy Rates and Rents by Authority Area, 2019 and 2021

	Vacancy Rate (2019)	Vacancy Rate (2021)	Rental price per sqft (2019)	Rental price per sqft (2021)
Coventry Central	5.40%	6.10%	£11.75	£15.72
Coventry Fringe	1.70%	6.10%	£15.84	£16.26
North Warwickshire	5.70%	5.20%	£15.25	£14.56
Nuneaton and Bedworth	1.20%	5.00%	£10.09	£15.98
Rugby	2.30%	1.70%	£11.36	£11.04
Stratford Upon Avon	3.70%	2.80%	£12.24	£12.92
Warwick	4.40%	6.30%	£16.60	£17.73
Coventry and Warwickshire	3.50%	5.30%	£14.92	£16.05
UK	4.80%	7%	£27.17	£26.91

Source: CoStar Commercial Property Data.

- 3.21 In 2019 the vacancy rate across Coventry and Warwickshire was just 3.5%. This is lower than what it generally deemed appropriate for effective functioning of the market (to allow for churn and new demand). It can be seen that in 2019, Coventry Central, North Warwickshire and Warwick had a higher rate of vacancy than Coventry and Warwickshire as a whole, whereas the vacancy rate in Coventry Fringe and Stratford upon Avon was lower.
- 3.22 Between 2019 and 2021, the vacancy rate increased across the study area as a whole to 5.3% (albeit to a level still likely to be lower than optimal⁹). It increased in the main office markets of Coventry and Warwick/Leamington to around 6%. The evidence does not however point to an excess vacancy at the current point; albeit that there is some prospect that this could rise further in the short-term.
- 3.23 CoStar's latest data (as at September 2022) points to some further growth in the vacancy rate which has risen to 6.2% at the sub-regional level, in particular as companies have downsized their floorspace volumes. This is the highest vacancy rate since 2013. Better quality space is more strongly in demand – with evidence of a 'flight to quality.' CoStar nonetheless report that technology is a key growth area, in particular with the 'Silicon Spa' games development cluster in Leamington Spa. Major lettings in this area include the pre-let to Sumo Group of 44,000 sq.ft at Bedford Street Studios in May 2022.

⁹ Around 7.5%

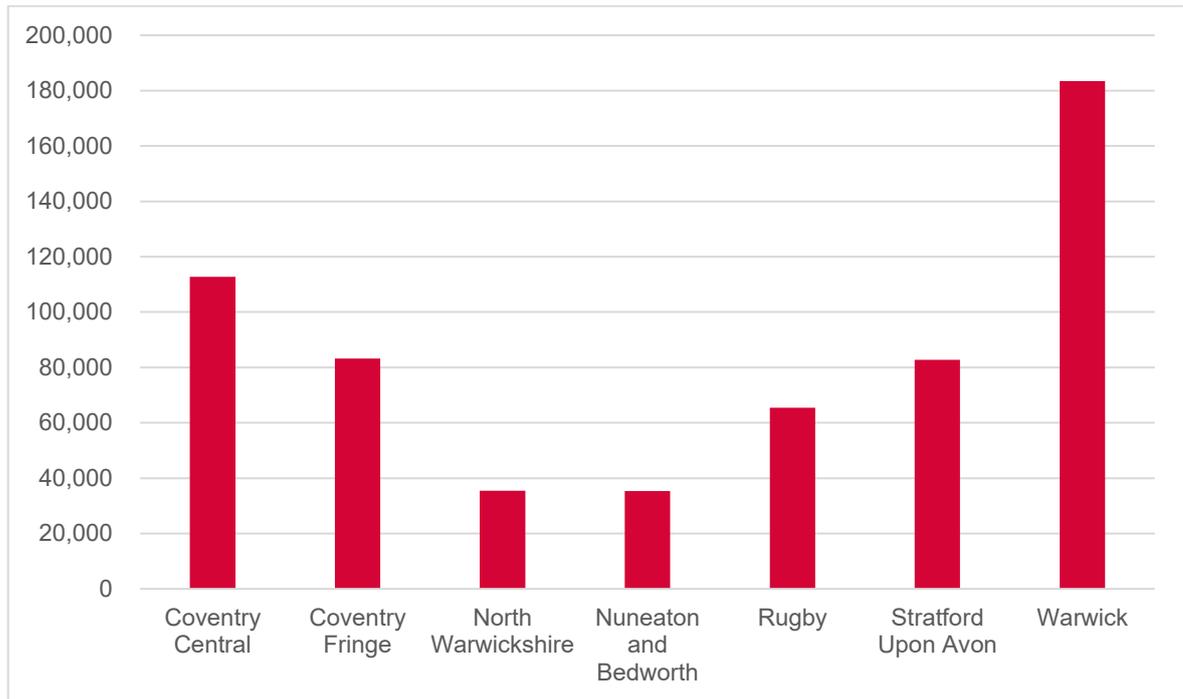
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- 3.24 Recent leases from tech companies include Tata Consultancy Services signing for 21,800 sq.ft at Aura in May 2021, while Zipabout agreed for 3,300 sq.ft at Chapel Court in April 2021, both in Leamington Spa. Elsewhere, Widgeit Software leased 4,650 sq.ft at Bishops House in August 2021. Serco leased 34,000 sq.ft at The Quadrant in Coventry on a nine-year lease term in April 2022.
- 3.25 Rental prices in Coventry and Warwickshire are much lower than the UK average¹⁰. The strongest markets are Warwick/Leamington and Coventry, with headline rents of around £25 psf currently at Friargate in Coventry City Centre, and £21 psf at Tachbrook Park in Leamington Spa (in 2021). A combination of values and the market sentiment means that no speculative development is currently taking place. Beyond these core markets, values are insufficient to support speculative office development. CoStar report that rental growth has turned negative during the 2021/22 period but growth is expected again in the coming months but not at the face seen in previous years.

Gross Absorption by Authority Area

- 3.26 The figure below shows the gross absorption of office space by authority area between 2009 and 2020. It can be seen the gross absorption is by far highest in Coventry and Warwick/Leamington which are the main office markets. On the other hand the lowest gross absorption of office space took place across North Warwickshire and Nuneaton and Bedworth.

¹⁰ Although this contains London, rents in Coventry and Warwickshire are still relatively low

Figure 3.7: Gross Absorption of Office Space by Authority Area, 2009-20



Source: Icen Analysis of CoStar Commercial Property Data

- 3.27 The table below shows changes in gross absorption over time. It can be seen that gross absorption decreased markedly across the study area between 2009 and 2019; aside from in Coventry Fringe in which gross absorption actually went up as new space was brought forward at locations such as Whitley Business Park and Ansty Park. Between 2014 and 2019, gross absorption declined across each authority area but did so to a much less extent in Coventry influenced by the initial phases of the Friargate scheme in the City Centre.
- 3.28 The change between 2019 and 2020 indicates the impact of Covid-19 on demand in each authority area. It can be seen that gross absorption fell significantly across Coventry and Warwickshire as a whole (the exception being in Stratford-upon-Avon).

Table 3.2 Change in Gross Absorption

	2009 to 2019 change	2014 to 2019 change	2019 to 2020 change
Coventry Central	-60.9%	-14.2%	-89.8%
Coventry Fringe	9.9%	-17.0%	-93.7%
North Warwickshire	-56.5%	-49.0%	-51.4%
Nuneaton and Bedworth	-84.5%	-59.5%	-26.5%
Rugby	-89.4%	-50.9%	-15.4%
Stratford Upon Avon	-74.4%	-52.2%	48.9%
Warwick	-49.7%	-33.6%	-32.5%

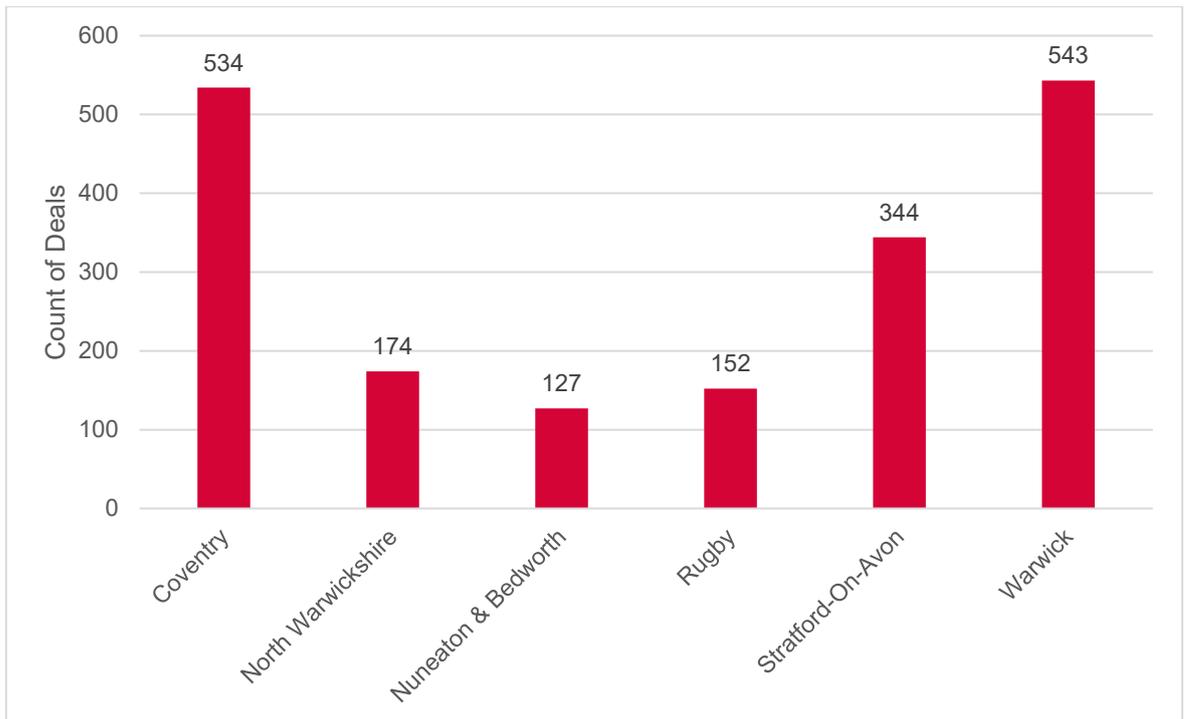
Coventry and Warwickshire	-61.8%	-33.7%	-52.3%
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Source: CoStar Commercial Property Data.

Lease Comps by Authority Area

3.29 The figure below shows the volume of office lease activity by authority area over the last 10 years. It can be seen that out of the 1,874 lease completions in Coventry and Warwickshire, 534 were in Coventry (at least 227 of which were in Coventry Central, likely to be around half) and 542 were in Warwick again highlighting the role of these areas as the main office markets.

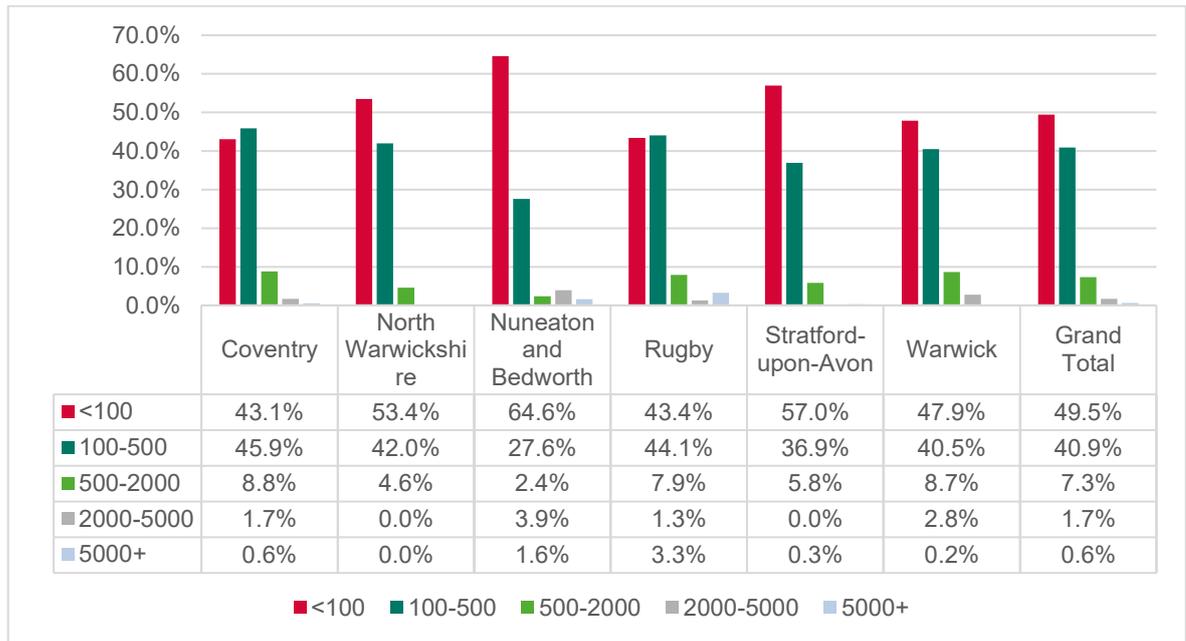
Figure 3.8: Office Lease Completions by Authority Area



Source: CoStar Commercial Property Data (Aug 2011-Aug 2021).

3.30 The figure below shows the proportion of offices leased by size band in each authority area over the last ten years. It can be seen that the vast majority of office leases were of space below 500 sqm (~90%). Coventry, Rugby and Warwick have a larger proportion office space leases (greater than 500 sqm). Looking at incomplete data on the split between Coventry Central and Coventry Fringe, there is a slightly higher percentage of office spaces under 100 sqm in Coventry Central and a slightly higher percentage of larger office spaces in Coventry Fringe.

Figure 3.9: Offices Leased by Size Band (sqm) and Local Authority 2012-2021



Source: IcenI Analysis of CoStar Commercial Property Data

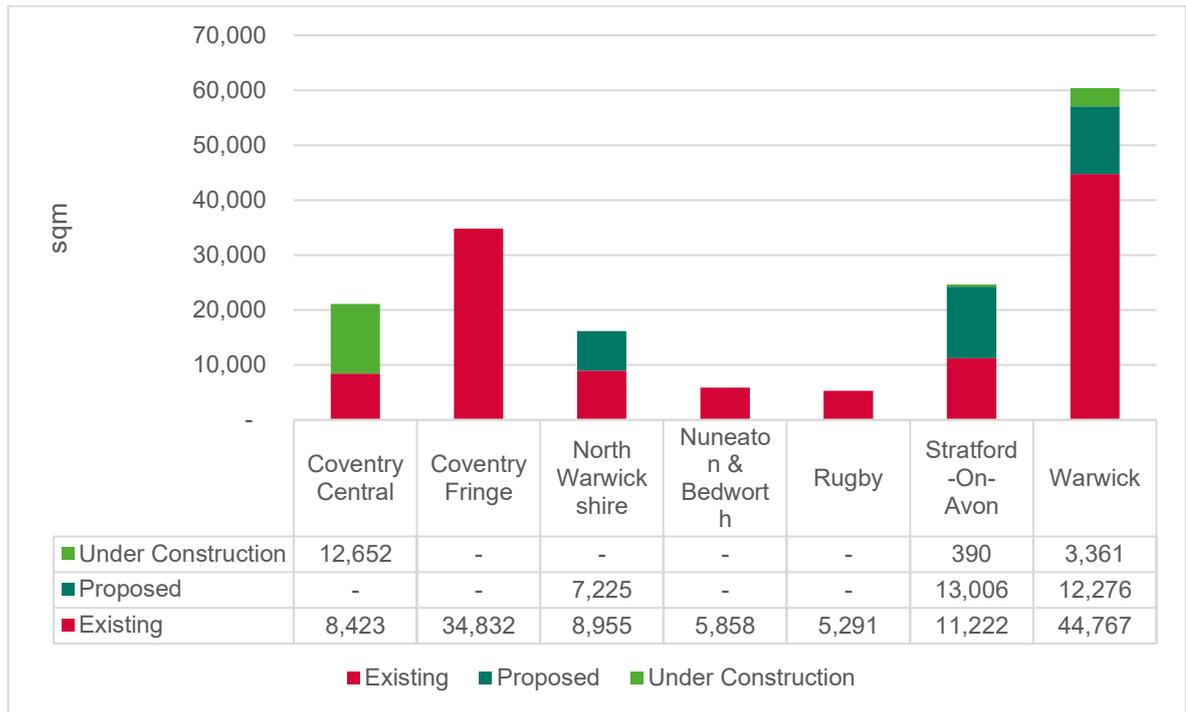
Office Availability

- 3.31 The figure below shows the current available and pipeline office space¹¹ in each authority area as at mid 2021, broken down by status (existing, proposed¹² and under construction).
- 3.32 It can be seen that Warwick has the most available office floorspace, the majority of which is existing, with some proposed and a small fraction under construction. There are very low levels of available floorspace in Nuneaton and Bedworth, Rugby and North Warwickshire and Stratford-on-Avon – i.e. beyond the main office markets in the sub-region.

¹¹ Co-star data on the 29/07/21

¹² Land considered for a particular future use or a building that has been announced for future development. The project is not expected to start construction in the next 12 months.

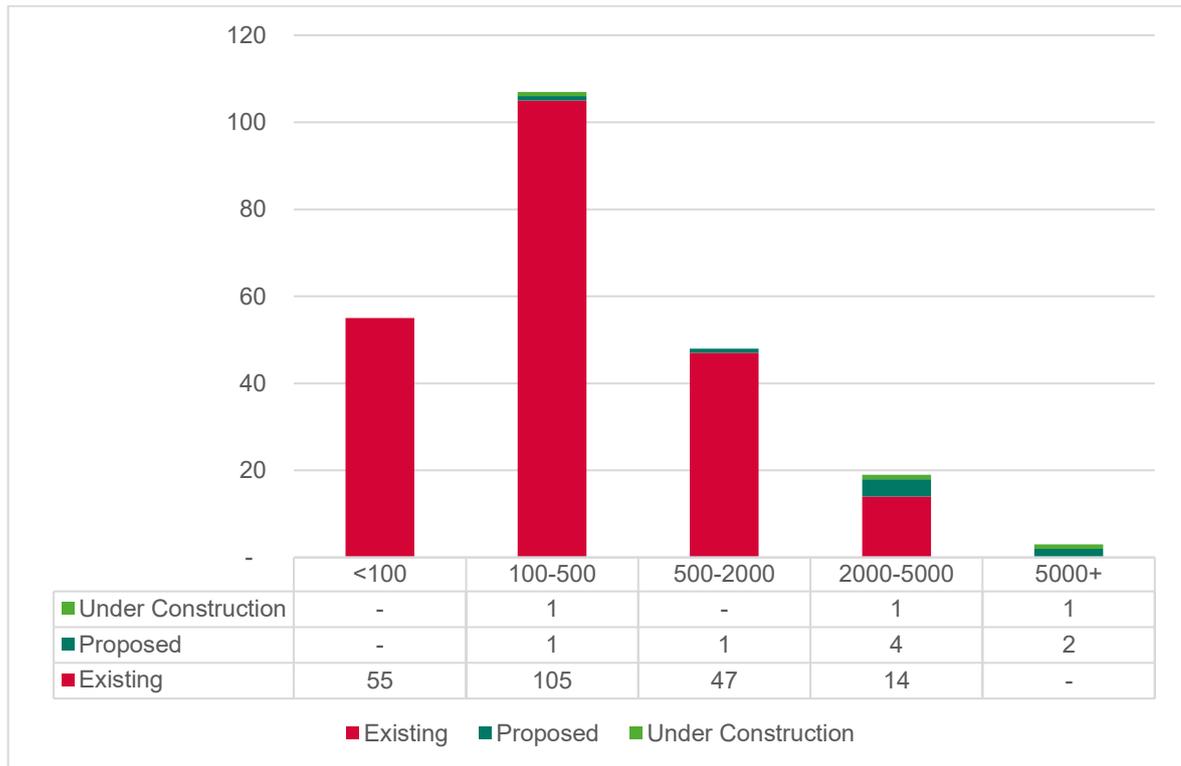
Figure 3.10: Office Floorspace Availability (sqm) by Local Authority and Status, mid 2021



Source: Icen Analysis of CoStar Commercial Property Data

- 3.33 The figure below shows the number of offices available by size band and broken down by status. It can be seen that office space between 100 and 500 sqm has the largest availability. Availability then decreases with size.
- 3.34 It can be seen that a significant proportion of available larger office buildings (2000+ sqm) are proposed – 25% of that between 2,000 and 5,000 sqm and 2 out of 3 above 5000 sqm (the other being under construction).

Figure 3.11: Office Availability by Size and Status



Source: IcenI Analysis of CoStar Commercial Property Data

3.35 The table below shows the split of office space in each authority area by Building Class¹³. It can be seen that only 11.2% of available advertised space is Class A all of which is in Stratford-On-Avon (over half this authorities space is Class A) and Warwick. Most space is Class B – 87.3% across Coventry and Warwickshire as a whole but nearly all in Coventry, North Warwickshire and Nuneaton and Bedworth. Only 1.5% of space across the study area is Class C. However, in Rugby 14.4% of space in Class C pointing to a potential surplus of older/dated space. This reflects build space on the market as at Dec 2020. We would note that Class A space is also being delivered at Friargate in Coventry.

¹³ The office building class designation is a way of differentiating buildings of the same building type into different categories of quality. These classes represent a combination of a subjective and objective quality rating of buildings that indicates the competitive ability of each building to attract similar types of tenants. Assigning class codes allows us to compare individual buildings within a market as well as across markets, and also to compare office market conditions between areas in peer groups. For the purposes of comparison, CoStar groups office buildings into four classes. The options are Class A, B, C, or F, with assignment depending on a variety of building characteristics, such as total rentable area, age, building finishes and materials, mechanical systems standards and efficiencies, developer, architect, building features, location/accessibility,

Table 3.3 Availability in City Centre and Out-of-Town Markets, Dec 2020

	Class A	Class B	Class C
Coventry Central	0.0%	100.0%	0.0%
Coventry Fringe	0.0%	99.8%	0.2%
North Warwickshire	0.0%	98.8%	1.2%
Nuneaton & Bedworth	0.0%	97.3%	2.7%
Rugby	0.0%	85.6%	14.4%
Stratford-On-Avon	52.8%	45.3%	1.9%
Warwick	9.6%	88.9%	1.6%
Overall	11.2%	87.3%	1.5%

Source: IcenI analysis of CoStar Commercial Property Data

Agent Feedback

- 3.36 IcenI has engaged with Coventry-based commercial property surveys, Holt Commercial, to further understand current market dynamics. At the time of writing in August 2021 the market is characterised by significant uncertainty and as a result very limited levels of market activity. Occupiers are unsure of future working patterns and the impact on demand for space from growth in home working (2-3 days per week at home); whether staff will hot desk or require dedicated/more space; and meeting room requirements as how these factors interact will influence future space requirements. As a result activity is low, albeit the volume of inquiries is showing some signs of growing.
- 3.37 Holt Commercial report good demand for serviced office space in the core markets, with schemes such as Friars House in Coventry City Centre performing well. No new-build development of serviced offices is however coming forwards.
- 3.38 Holt Commercial report limited change in rental levels and little current speculative development activity, which is consistent with the above analysis of growing availability. With One Friargate completed in Coventry City Centre, development of Two Friargate has started which provides 136,000 sq.ft of Grade A Space with floorplates from 11,000 sq.ft. We understand that two of the 12 floors are pre-let at the current time. No new development activity is evident in the Coventry Fringe office market, with the exception of the replacement of a 2 storey office block at Westwood Business Park with student accommodation. Within the City Centre, Coventry Point (c. 1m sq.ft) has been demolished to be replaced by student development.
- 3.39 At Tachbrook Park in Leamington Spa, a new 60,000 sq.ft European HQ has been delivered for Tata Technologies Europe Ltd, supporting its relocation from Coventry Technology Park and associated

property manager, design/tenant layout, and much more. Once assigned, a building's class reflects not only characteristics and attributes evaluated objectively, but also the subjective evaluations of finishes and amenities (CoStar Glossary).

growth. Rents were c. £21 per square foot (psf). Developments in the pipeline include the conversion of the former House of Fraser store in Leamington to provide over 60,000 sq.ft of Grade A offices, which is expected to be completed in October 2022. Plato Close, Tachbrook Park in Warwick is due to deliver 40,000 sq.ft of office space in Spring 2023.

- 3.40 Beyond these core markets, occupier interest is limited and development is likely to require a pre-let at a premium, or development to be subsidised by higher value uses such as residential.
- 3.41 The two universities have continued to grow, supporting demand for space in the main science and technology park sites; but there are impacts associated with Covid-related restrictions on overseas students.

Office Market – Summary and Key Points

The office market has been weakened Covid-driven shift towards homeworking and associated uptake of virtual communication technologies is likely to have some impact on future requirements with a range of companies likely to support at least part-time working from home. Whilst this may be in part offset by changing use of office space and associated layouts, it is likely to have some downward impact on future office floorspace needs. It can also be expected to drive a flight towards good quality space.

There is evidence of vacancy levels in the office market rising in the short-term, which could limit new-build development activity; albeit that the starting point in 2020 was of very low availability of space. Older, poorer quality space could be difficult to relet.

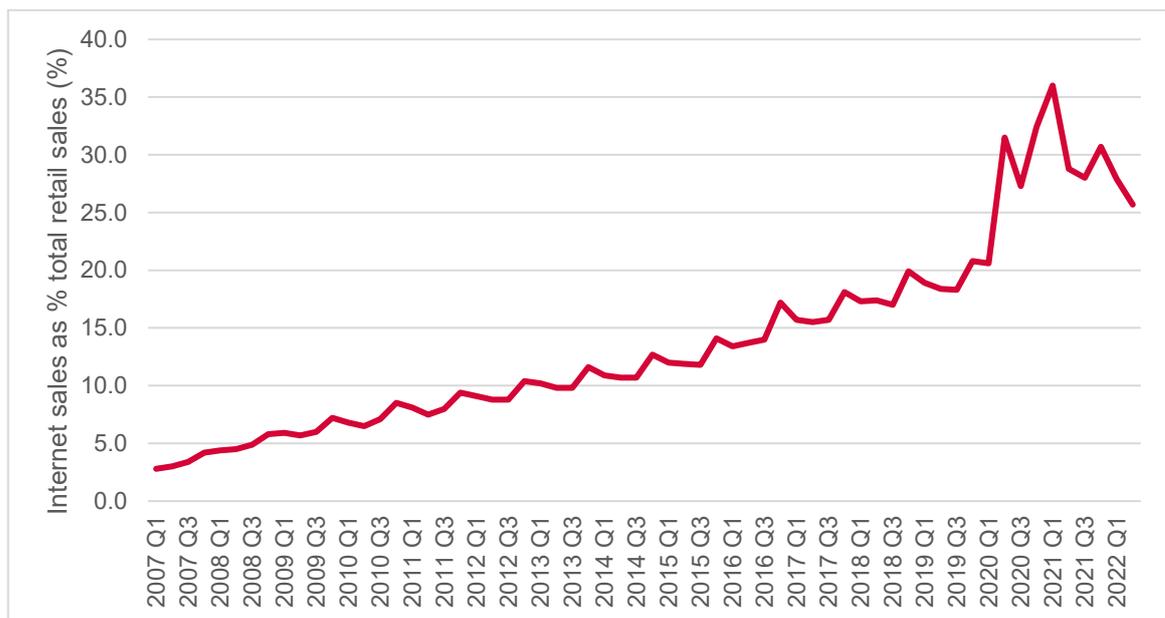
The evidence clearly indicates that the core office markets are Coventry and Leamington/Warwick and we would expect future office supply to be focused on these. Beyond these markets, rental levels mean that delivery of office floorspace is commercially challenging and may require cross-subsidy and/or public sector support/intervention. Policy support may however have a role in supporting job creation in higher value activities in these areas.

Industrial Market Overview

- 3.42 The pandemic and the UK's exit from the EU have evidenced the important role of the logistics sector to keep food and goods moving. 2021 is expected to bring further focus on building more resilient supply chains, increasing stocks and diversifying suppliers to prevent future disruptions. This restructure of logistics networks will require additional warehousing space in the UK.

3.43 The market for logistics space is being buoyed by expanding demand from online retailers who are benefiting from the lasting effects of COVID-19 in consumer behaviour. Retailers wanting to preserve market share will need to continue to secure warehouse space to expand their online channels. The graph below shows national trends in the volume of internet sales – i.e. e-retailing. There is a clear upward trend here, and the level of e-retailing pre-pandemic had grown to over 20% sales (with the current position as at July 2022 having settled at 25.3%). This compares to a figure of around 12% in 2015 and 7% in 2010.

Figure 3.12: Growth in Internet Retail Sales – UK



Source: ONS

3.44 CBRE report that the second half of 2020 saw occupiers opting for longer leases compared to the reactive short-term contracts seen in the second quarter. In 2021 they expect longer commitments for the renewals of those short-term leases in most cases, and occupiers reverting to their planned expansions.

3.45 Savills Big Sheds Briefing (Jan 2021) reports that 2020 broke all previous records with new leases signed for 50.1 million sqft of warehouse space, 12.7 million sqft ahead of the previous record set in 2016 and comprising 165 separate transactions, breaking the previous record of 163 set in 2014. Whilst it is important to say that a large proportion of this space was leased to Amazon (25%) with a number of leases on terms less than five years (12%), take-up would still break new records even if Amazon and short-term deals were removed from the time series. Another key trend in 2020 has been the surge in the take-up of units over 500,000 sqft, with 25 deals recorded, making it the highest year since Savills records began and also more than the previous two years combined. Given the

number of businesses currently in the market for units over 500,000 sqft, this is a trend was expected to continue into 2021. 2021 overall has seen this trend of strong take-up of industrial space continue.

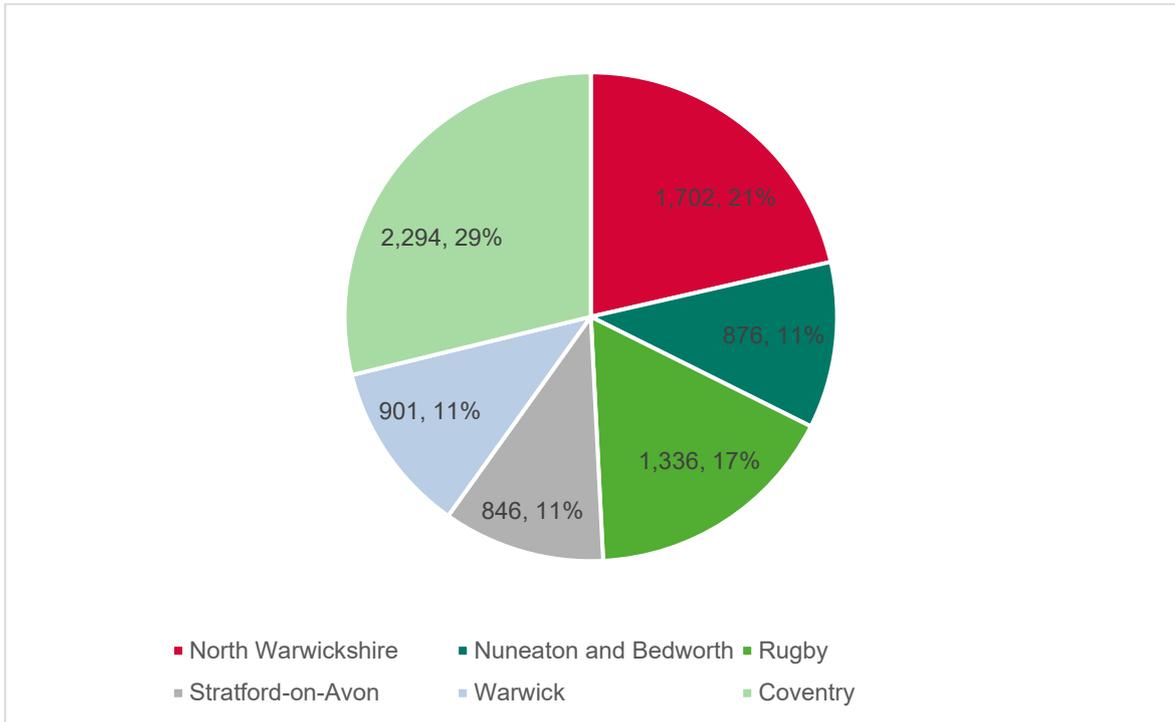
- 3.46 Other influences on market demand include increased stock holding requirements, influenced by Brexit and other factors influencing trade, as well as demand for modern floorspace which aligns with companies' ESG requirements, is energy efficient and has sufficient power capacity, including to facilitate increased automation.
- 3.47 In May 2021, Cushman and Wakefield reported that the industrial and logistical sector showed continued its 2020 momentum in Q1 2021, with a 115% increase in take-up on Q1 2020 and 55% rise on the ten-year average. They also reported that retail, parcel delivery and third part logistics occupiers accounted for 70% of quarterly take-up. Looking forward, Cushman and Wakefield predicted that 2021 would be another strong year for logistics. More recent market evidence points to continues strong take-up across core markets.

Coventry and Warwickshire Industrial Market

Industrial Stock

- 3.48 VOA data shows that in the year 2019/20 the Study Area had 7,800 industrial properties providing 7,955,000 sqm of industrial floorspace in total. This represents 17.5% of the industrial floorspace across the West Midlands. This suggests that the Study Area has a relatively large industrial sector given its working age population only makes up 16.2% of that of the West Midlands.
- 3.49 The figure below shows that industrial floorspace is relatively spread out across the authorities within Coventry and Warwickshire (albeit with a greater concentration in Coventry and the north than South Warwickshire). However, Coventry supports the largest proportion of the Study Area's industrial market (29%) with North Warwickshire also supporting over 20%.

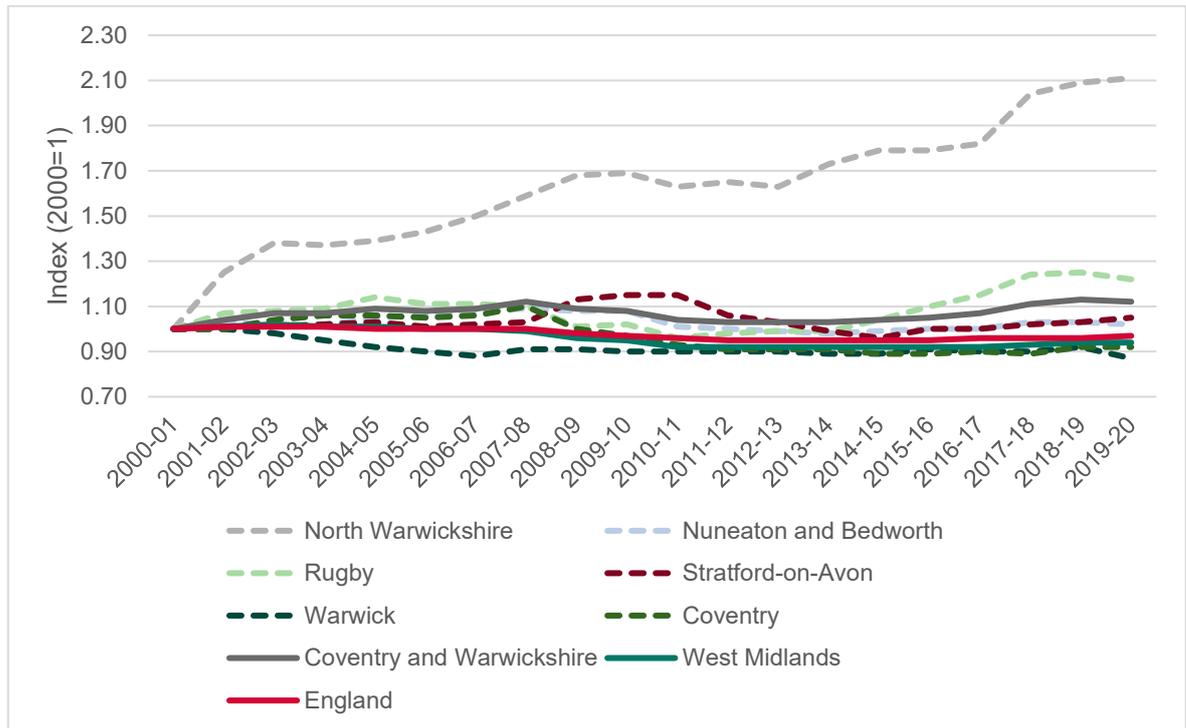
Figure 3.13: Industrial Floorspace by Local Authority 2019/20 (Thousands of sqm; %)



Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

- 3.50 The figure below shows the change in the amount of industrial floorspace. Over the last 20 years, the amount of industrial floorspace grew by 12% across Coventry and Warwickshire. This was particularly driven by a 111% growth in North Warwickshire (influenced by development at Birch Coppice in particular) but large growth of 22% also took place in Rugby.
- 3.51 Between 2015 and 2020 the volume of space also grew 1 million sq.ft, out-pacing the ~2% growth regionally and nationally. This growth was again driven in particular by growth of 18% across North Warwickshire and 11% across Rugby.

Figure 3.14: Indexed Industrial Floorspace by Local Authority 2010/11 – 2019/20



Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

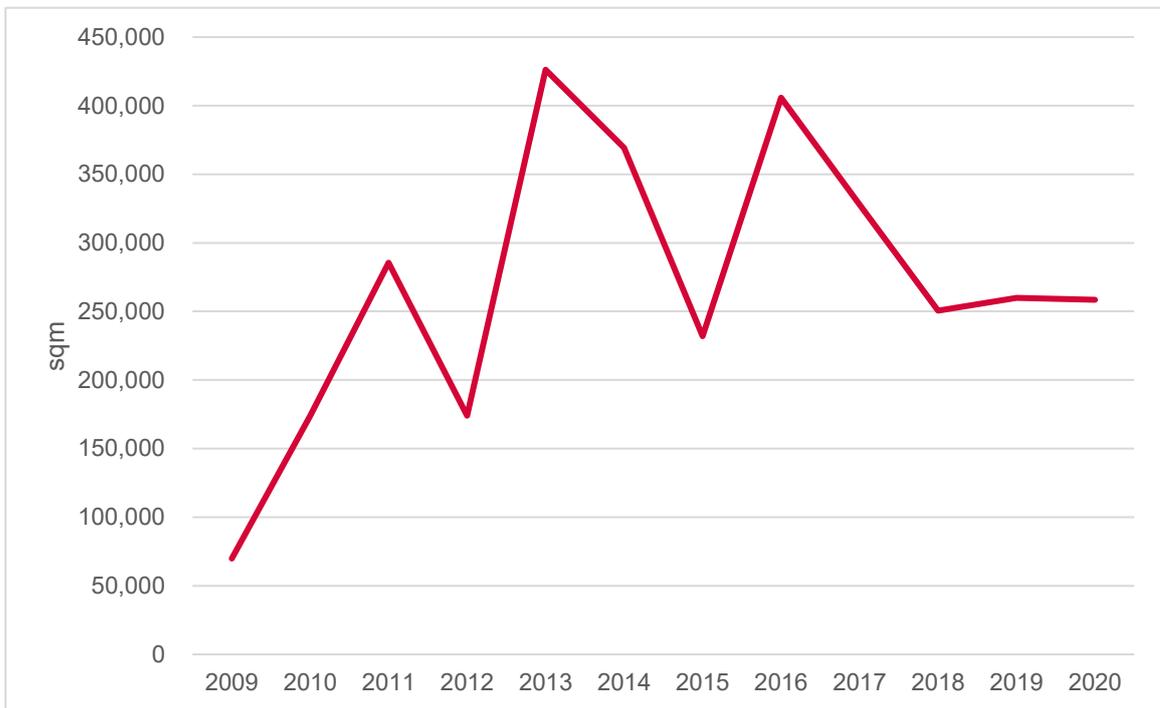
3.52 More recent data indicates that the industrial stock has grown further, to 8,2 million sq.m in 2022. The last 10 years (2012-22) has therefore seen 11.3% growth in industrial floorspace within the sub-region. Over the last 5 years, the strongest increases have been in North Warwickshire and Rugby (291,000 and 179,000 sq.m respectively), with industrial floorspace only falling in net terms in Coventry.

Absorption, Delivery and Vacancy Trends

3.53 As stated above, gross absorption is the amount of space which has become physically occupied (moved in to). It provides an indication of the strength of the market but does not take into account the amount of space vacated. It indicates take-up of space (both new-build and existing).

3.54 The figure below shows that gross absorption increased across Coventry and Warwickshire between 2009 and 2020. Average gross take-up (absorption) of industrial space over the 2013-20 period has been 316,300 sq.m per annum.

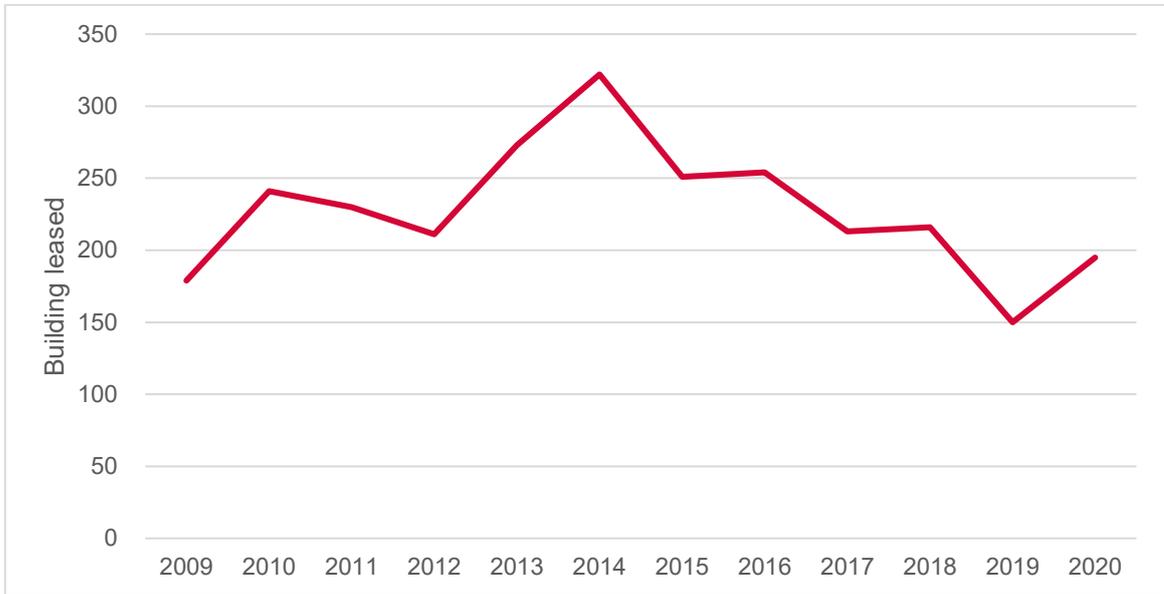
Figure 3.15: Gross Absorption of Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.55 To supplement gross absorption data (amount of space moved in to), lease completions data has also been analysed to help paint a picture of demand for industrial space without taking into account the size of leases/move ins. This is a measure in effect of market activity. It shows a strong recovery in the market in 2013/14 following the previous recession; with lower market activity in 2019/20 likely in part influenced by Brexit-related uncertainties. The pattern is similar to that for gross absorption.

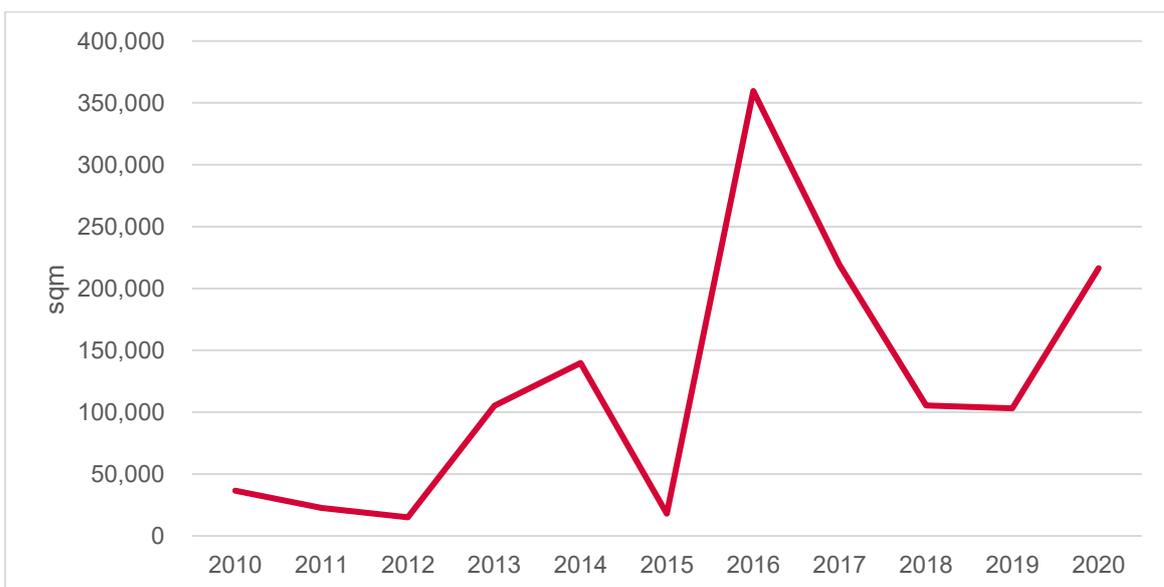
Figure 3.16: Lease Completions for Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.56 Co-star data suggests that there was around 1,340,000 sqm of net new industrial floorspace delivered between 2010 and 2020 which is evidently a very significant volume; of which 1,021,000 sq.m has been delivered over the 2015-20 period. As can be seen in the figure below, net deliveries (the balance between new-build construction and losses) have been varied greatly over this period and 578,00 sqm of these net deliveries came in 2016 and 2017.

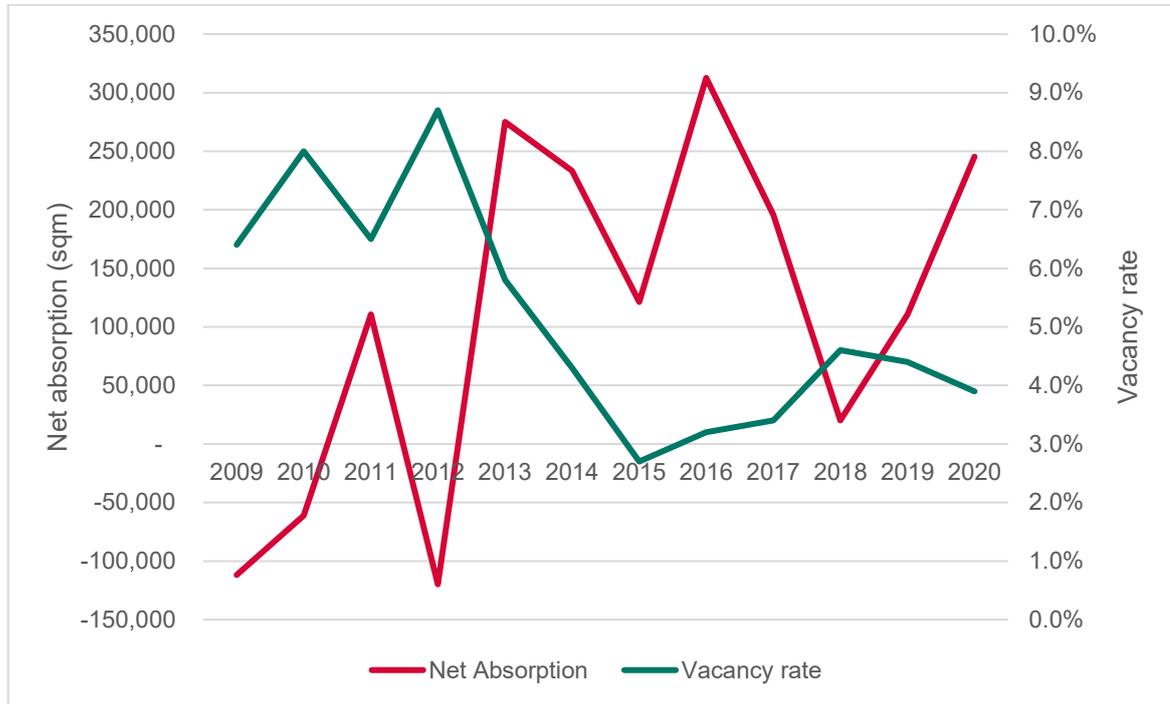
Figure 3.17: Net Deliveries of Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

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- 3.57 As stated above, CoStar provides data on net absorption which describes the net change in physically available space which is calculated by deducting the space vacated by tenants and made physically available within the local market from the total space which becomes physically occupied and is lost (e.g. through demolition). Therefore, net absorption indicates that net change in demand relative to supply of space. A positive net absorption figure means that the proportion of vacant space is falling, whilst a negative level indicates that more space was coming onto the market than being taken-up/lost.
- 3.58 The figure below shows absolute net absorption and vacancy rates across Coventry and Warwickshire between 2009 and 2020. It can be seen that between 2009 and 2020, overall net absorption was 1,332,000 sqm. This suggests strong demand relative to the supply of office floorspace. Net absorption was low (and generally negative) between 2009 and 2012 before rising and peaking at over 300,000 sqm in 2016. Since then net absorption fell before rising to around 250,000 sqm in 2020.
- 3.59 Since 2012, the positive net absorption rate has contributed to a declining vacancy rate – from 8.7% in 2012 to 2.7% in 2015. When net absorption is positive, the vacancy rate would be expected to decrease. However, as can be seen in the figure below, the vacancy rate increased by around 1 percentage point between 2015 and 2020 despite positive net absorption. This may be due to the fact that newly delivered space is counted in the vacancy rate calculation before it is counted within the net absorption calculation (Co-star states that space becomes part of the inventory, and hence the denominator in the calculation of the vacancy rate, when it is suitable for occupancy). Nonetheless, the level of vacant space at under 4% in 2020 is low and points to a continuing need for delivery of new industrial floorspace.
- 3.60 Net absorption of industrial space has averaged 189,300 sq.m per annum over the 2013-20 period, with the five year average slightly lower at 167,600 sq.m, across Coventry and Warwickshire.

Figure 3.18: Net Absorption and Vacancy of Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

Vacancy and Rents by Authority Area

3.61 To understand the relative strength of the industrial market between the authority areas within Coventry and Warwickshire, 2019 and 2021 vacancy rates and rental prices have been gathered and are presented in the table below. Comparing between the 2019 and 2020 vacancy rates provides an indication of the impact of Covid-19.

Table 3.4 Vacancy Rates and Rents by Authority Area, 2019 and 2021

	Vacancy Rate (2019)	Vacancy Rate (2021)	Rental price per sqft (2019)	Rental price per sqft (2021)
Coventry	7.1%	2.4%	£5.10	£5.77
North Warwickshire	2.1%	1.2%	£6.48	£6.73
Nuneaton and Bedworth	1.5%	2.7%	£5.65	£6.31
Rugby	4.7%	4.5%	£5.77	£6.49
Stratford Upon Avon	2.7%	8.9%	£4.33	£4.84
Warwick	5.9%	4.9%	£6.62	£6.69
Coventry and Warwickshire	4.4%	3.5%	£5.76	£6.07
UK	3.2%	3.2%	£6.67	£7.24

Source: CoStar Commercial Property Data.

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- 3.62 In 2019 the vacancy rate across Coventry and Warwickshire was 4.4%. This is lower than what is generally deemed appropriate for effective functioning of the market at around 7.5% (to allow for churn and new demand). It can be seen that in 2019, Coventry and Warwick had a significantly higher rate of vacancy than Coventry and Warwickshire as a whole, whereas the vacancy rate in North Warwickshire, Nuneaton and Bedworth and Stratford upon Avon was lower.
- 3.63 Between 2019 and 2021, the vacancy rate decreased across the study area as a whole to 3.5% (significantly below optimal levels) but increased in some areas including Stratford upon Avon which subsequently has a vacancy rate of 8.9%. Coventry saw a particularly large decrease in vacancy rate to 2.4% - below the average for the study area as a whole. As at September 2022, CoStar report a 3.2% vacancy rate across the sub-region.
- 3.64 The evidence points to a short-term need to bring forward additional industrial space in the sub-region in the short-term.
- 3.65 Average industrial rents in Coventry and Warwickshire are below the UK average (although this contains London, rents in Coventry and Warwickshire are still relatively low). In 2019, the highest rental prices in terms of average rents recorded by CoStar were in Warwick and North Warwickshire. On the other hand rental prices in Coventry and Stratford upon Avon were significantly below the average for the study area. In Coventry this is likely to be influenced by the quality of some space.
- 3.66 Looking at 2021 to date, rental prices in Rugby have risen significantly and are now roughly significantly above the study area as a whole. CoStar in 2022 report a substantial 9.4% growth in industrial rents over the last 12 months; and described rents having been rising since 2014 with rental growth accelerating since the onset of the pandemic, led by demand for logistics. Robust sentiment towards Coventry's industrial market as well as the wider sector, means investor appetite is at an all-time high.
- 3.67 Prime industrial rents for smaller units (1500 – 2000 sq.ft) currently stand at over £10 psf (as at mid 2021), whilst for big box logistics units (100,000 sq.ft/ 9200 sq.m+), prime rents around Coventry are around £7.50 psf according to Holt Commercial. A dwindling supply has been driving rental growth. For the larger units, rents being achieved are some of the highest in the region, pointing to the strength of the sub-region as a market for big box logistics.

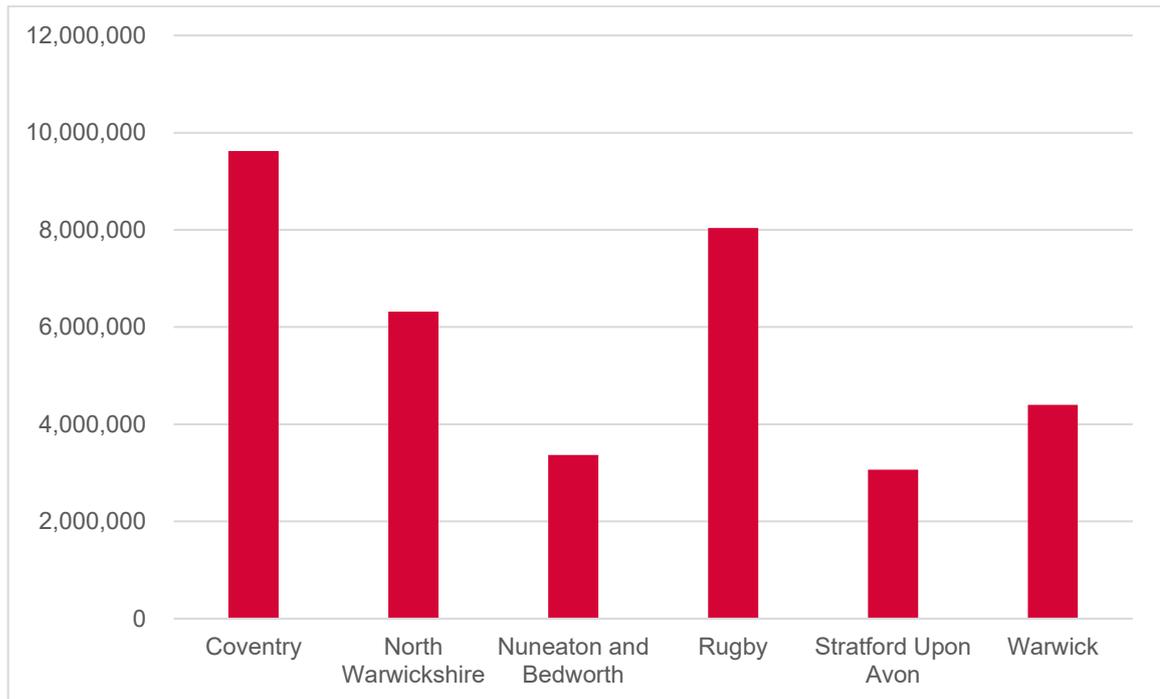
Gross Absorption by Authority Area

- 3.68 The figure below shows the gross absorption of industrial space by authority area between 2009 and 2020. It can be seen the gross absorption is highest in Coventry, closely followed by Rugby, and more generally is focused in the centre and north of the sub-region. On the other hand the lowest gross absorption of industrial space took place across Stratford Upon Avon and Nuneaton and

Bedworth. The low take-up in Nuneaton and Bedworth is however likely in part to have been influenced by supply-side constraints; with the take-up data not really picking up delivery on the allocations made in the 2018 Local Plan.

3.69 Overall the picture is of a greater focus of industrial floorspace demand towards the centre and north of the sub-region.

Figure 3.19: Gross Absorption of Industrial Space by Authority Area, 2009-20



Source: Icen Analysis of CoStar Commercial Property Data

3.70 The table below shows changes in gross absorption over time. It can be seen that gross absorption increased by 272% across the study area between 2009 and 2019. This was driven by substantial growth in Coventry, North Warwickshire, and Warwick.

3.71 The change between 2019 and 2020 indicates the impact of Covid-19 on demand in each authority area. It can be seen that gross absorption fell by just 1% across Coventry and Warwickshire as a whole highlighting the resilience of the industrial market; and the effect of the pandemic in driving growth in warehousing/logistics demand.

Table 3.5 Change in Gross Absorption

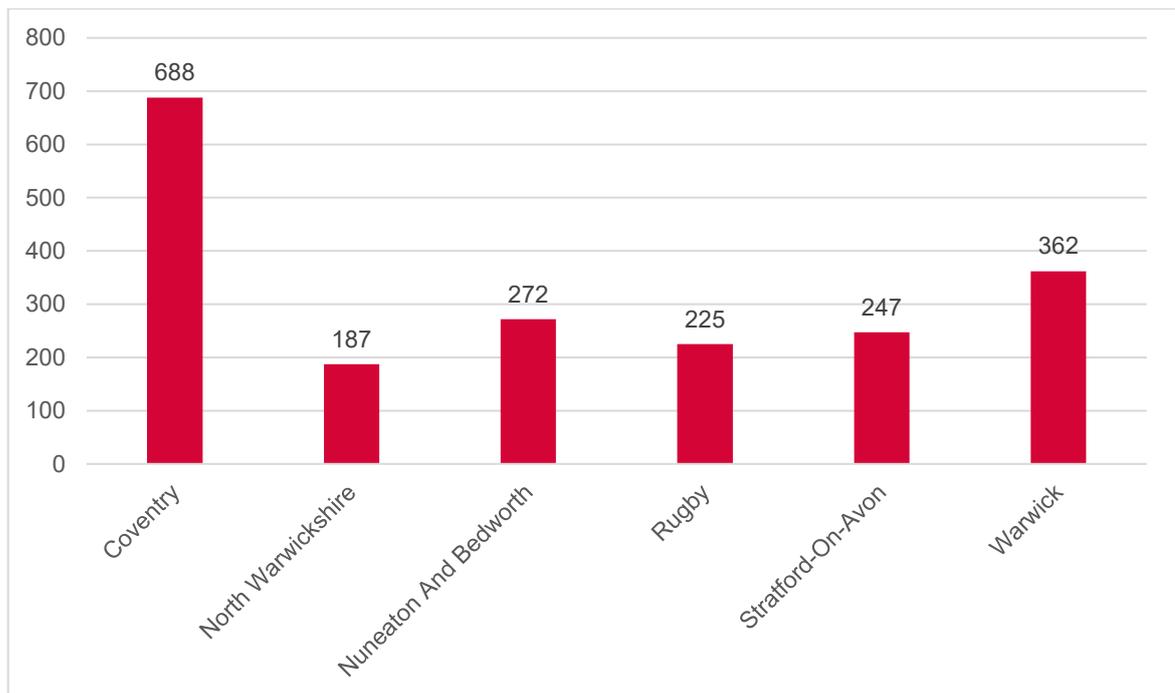
	2009 to 2019 change	2014 to 2019 change	2019 to 2020 change
Coventry	423%	26%	39%
North Warwickshire	541%	-39%	32%
Nuneaton and Bedworth	25%	12%	-45%
Rugby	84%	-86%	200%
Stratford Upon Avon	47%	-73%	-60%
Warwick	901%	103%	-81%
Coventry and Warwickshire	272%	-30%	-1%

Source: CoStar Commercial Property Data.

Leasing Activity by Authority Area

3.72 The figure below shows the number of industrial lease completions by authority area over the last 10 years. It can be seen that out of the 1,981 lease completions in Coventry and Warwickshire, 688 (around a third) were in Coventry.

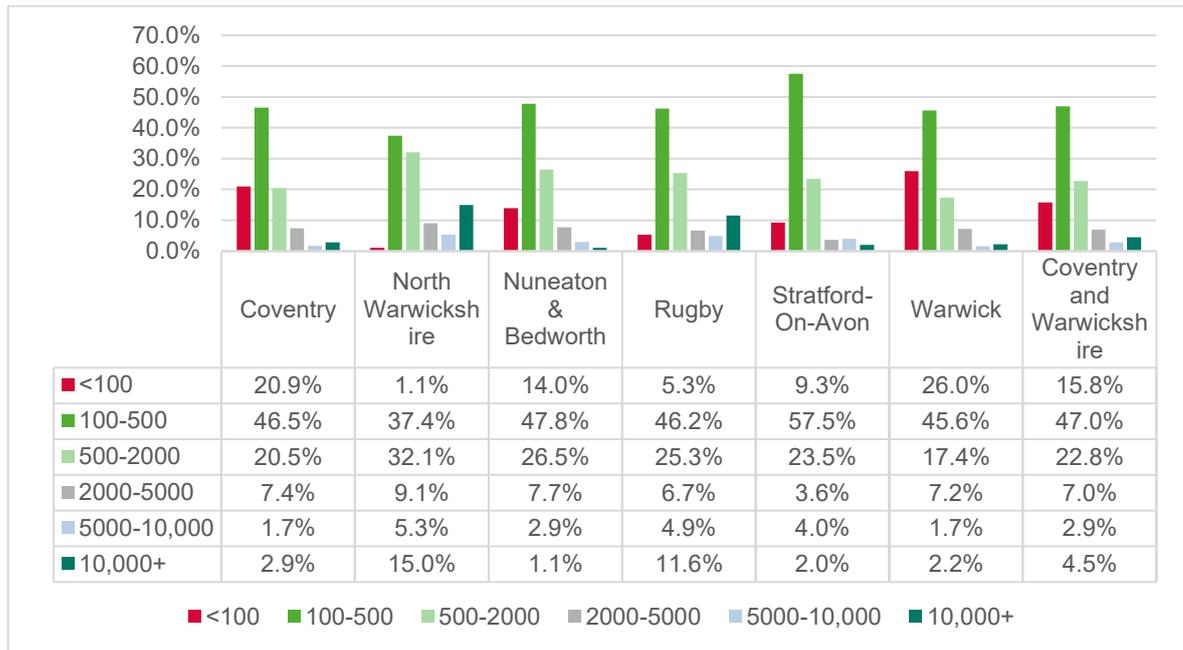
Figure 3.20: Industrial Lease Completions by Authority Area



Source: CoStar Commercial Property Data (Aug 2011-Aug 2021).

3.73 The figure below shows the proportion of industrial units leased by size band in each authority area over the last ten years. It can be seen that nearly half of industrial leases were of space between 100 and 500 sqm. North Warwickshire had a particularly high percentage of large leases – 15% of its leases were for space greater than 10,000 sqm in size.

Figure 3.21: Industrial Units Leased by Size Band (sqm) and Local Authority 2012-2021



Source: Icen Analysis of CoStar Commercial Property Data

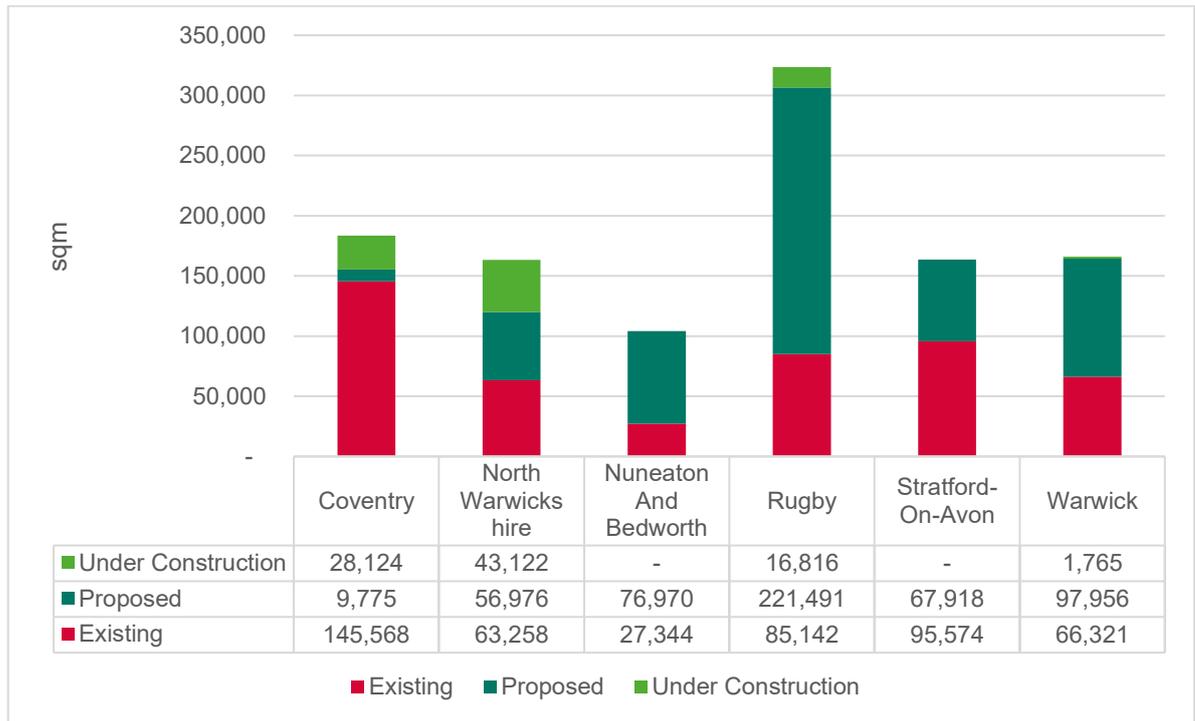
Industrial Availability

- 3.74 The figure below shows the current available and pipeline industrial space¹⁴ in each authority area, broken down by status (existing, proposed¹⁵ and under construction). It can be seen that Rugby has the most available/proposed industrial floorspace. Looking at existing and under construction floorspace only, Coventry has the most availability.
- 3.75 There are more modest levels of available/proposed floorspace in Nuneaton and Bedworth. The relatively high volumes of proposed and under construction space highlight the strength of market/developer interest in industrial development within the sub-region.

¹⁴ Co-star data on the 29/07/21

¹⁵ Land considered for a particular future use or a building that has been announced for future development. The project is not expected to start construction in the next 12 months.

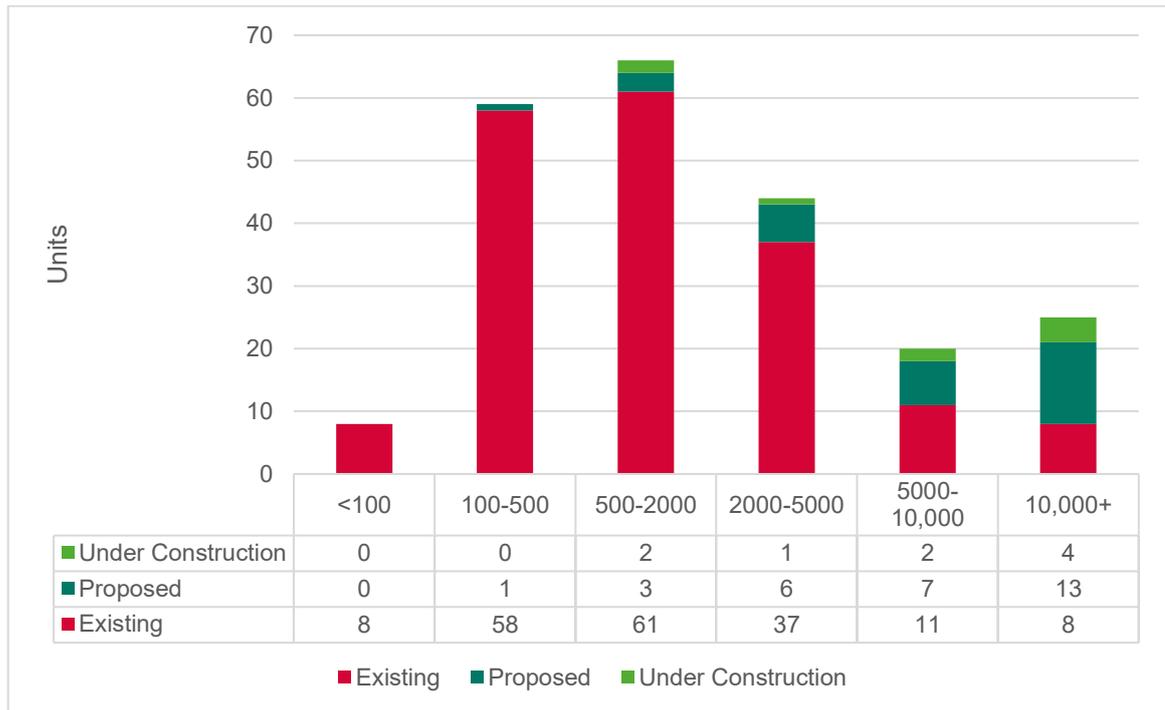
Figure 3.22: Industrial Floorspace Availability (sqm) by Local Authority and Status



Source: Icen Analysis of CoStar Commercial Property Data (dated July 2021)

- 3.76 The figure below shows the number of industrial units available by size band and broken down by status. It can be seen that industrial space between 500 and 2,000 sqm has the largest availability, closely followed by space between 100 and 500 sqm.
- 3.77 It can be seen that a significant proportion of available larger industrial units (5000+ sqm) are proposed – 35% of those between 5,000 and 10,000 sqm and 52% above 5000 sqm (the other being under construction).

Figure 3.23: Industrial Unit Availability by Size and Status



Source: Icen Analysis of CoStar Commercial Property Data

3.78 The table below shows the split of industrial space in each authority area by Building Class. It can be seen that only 34.1% of Coventry and Warwickshire’s available industrial space is Class A, but with higher levels of Class A space in Rugby and Warwick. Most space is Class B – 61.8% across Coventry and Warwickshire as a whole but nearly all in Coventry and Nuneaton and Bedworth. Only 4.5% of space across the study area is Class C.

Table 3.6 Table 4.2: Availability in City Centre and Out-of-Town Markets, Dec 2020

	Class A	Class B	Class C
Coventry	10.0%	84.8%	5.2%
North Warwickshire	27.9%	71.4%	0.7%
Nuneaton And Bedworth	2.5%	94.0%	3.5%
Rugby	52.7%	46.5%	0.7%
Stratford-On-Avon	23.1%	69.2%	7.7%
Warwick	61.1%	29.2%	9.7%
Coventry and Warwickshire	34.1%	61.8%	4.1%

Source: Icen analysis of CoStar Commercial Property Data

Agent Feedback

3.79 Holt Commercial report very strong current demand for industrial floorspace, a shortage of available stock, and as a result growing rents and significant growth in land values. Yields for big sheds are at record levels of 4% or less.

-
- 3.80 Industrial availability in and around Coventry is currently limited but there are a pipeline of schemes coming forwards (principally in surrounding areas) including 55 acres at Chase Point (within Nuneaton and Bedworth Borough) expected to be marketed late 2021/early 2022. Infrastructure is being delivered to bring forward development at Segro's Coventry and Warwickshire Gateway South scheme with potential for up to 3.6m sq.ft of distribution space; with 180,000 sq.ft being developed by Canmore at Whitley Business Park. There is potential for some further space to be delivered as part of Sustainable Urban Extensions.
- 3.81 Industrial demand is currently strong across size bands across much of the centre and north of the sub-region. Recent schemes at Rugby have performed well, with new big box supply expected to come forwards through Prologis' DIRFT3 and through development of land with outline planning permission at the junction of the A45 and M45 (albeit infrastructure works have yet to be started).
- 3.82 Holt Commercial report limited industrial land supply remaining in Warwick/Leamington, with the principle availability being remaining plots at Tournament Fields and Spa Park. Industrial market activity in Stratford District is lower than in other parts of the sub-region, with limiting remaining available supply at Wellesborne and the main prospective growth focused at Gaydon to support growth of the existing Jaguar Land Rover/ Aston Martin operations.

Industrial Market – Summary and Key Points

The sub-region, and in particular the northern and central parts of it, clearly has a strong and dynamic industrial market. The evidence points to a very significant stock of industrial floorspace at over 8 million sq.m of space and sustained high take-up over the period since 2013. Whilst there are some challenges for the automotive sector, which can be relatively cyclical and has influenced strong take-up in recent years, demand for logistics/distribution space looks likely to remain strong buoyed by the growth in e-retailing in particular. Rents and land values have grown to record levels.

Available industrial space remains low and the strength of demand has supported strong recent development activity together with growth in rents, with a very substantial 1.3 million sq.m of space delivered since 2013 with over 1 million sq.m over the 2015-20 period. Average gross take-up since 2013 has been 316,000 sq.m per annum and whilst this has partly resulted from replacement of older space, net absorption of space has equally been very strong at almost 190,000 sq.m per annum. New supply does appear to be coming forwards, not least as sites allocated in the last round of local plans start to progress, but there will likely be a continuing need to replenish industrial supply over time if economic growth is not to be constrained.

4. HOUSING MARKET DYNAMICS

4.1 In this section we move on to consider housing market dynamics, addressing both the sales and rental markets. This section principally sets out the position as at mid 2021 when this section of the report was originally drafted.

Sales Market

4.2 The median house price across the C&W Housing Market Area was £247,000 considering sales over the year to Dec 2020. This was 5% below the national average. Values however vary within the HMA, with the highest prices in Stratford-on-Avon at £325,000; and the lowest in Nuneaton and Bedworth at £185,000.

Table 5.1: Median House Price, Year to Dec 2020

	Median House Price, Year to Dec 2020	Difference to HMA Average
North Warwickshire	£215,000	-15%
Nuneaton and Bedworth	£185,000	-33%
Rugby	£249,950	1%
Stratford-on-Avon	£325,000	24%
Warwick	£319,134	23%
Coventry	£187,000	-32%
C&W HMA	£247,000	0%
West Midlands	£206,000	-20%
England	£259,000	5%

Source: ONS Small Area House Price Statistics Dataset 9

4.3 House prices have grown over the last 20 years (2000-2020) by an average of 6.9% per annum. This is modestly above average for both the region and nationally and in particular reflects stronger recent house price growth.

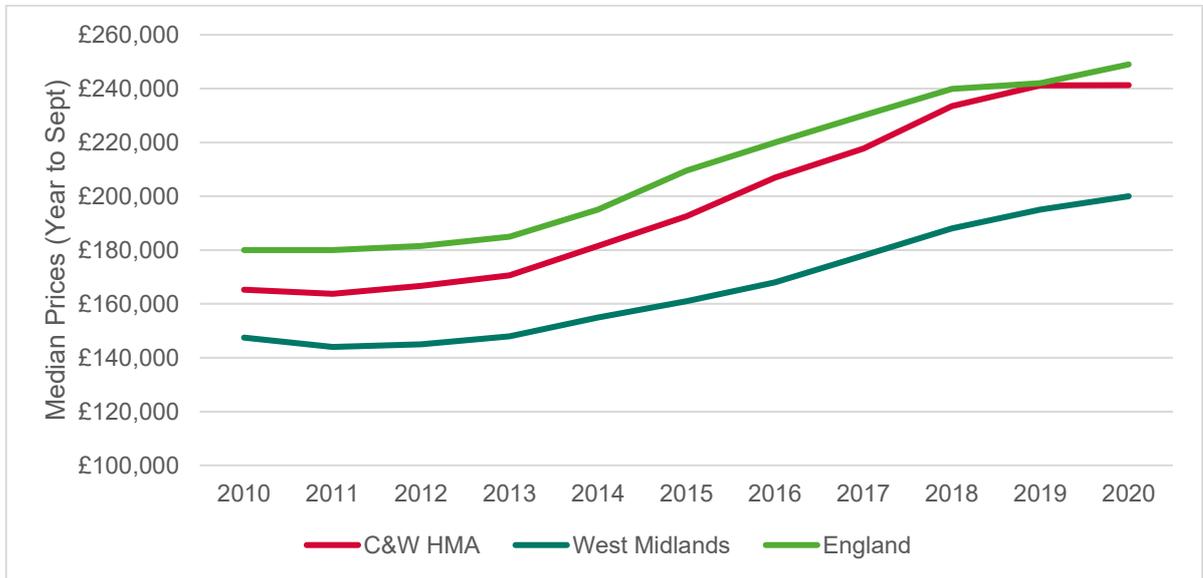
Table 5.2: Annual House Price Growth over different Periods (% CAGR)

CAGR	2005-10	2010-15	2015-20	20 Year
C&W HMA	1.6%	3.1%	4.6%	6.9%
West Midlands	1.0%	1.8%	4.4%	5.7%
England	1.3%	3.1%	3.5%	5.8%

Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.4 As the chart below shows, we have seen stronger house price growth in the HMA relative to the regional and national average since 2013. The median house price in 2020 was £41,000 above the West Midlands average across the HMA.

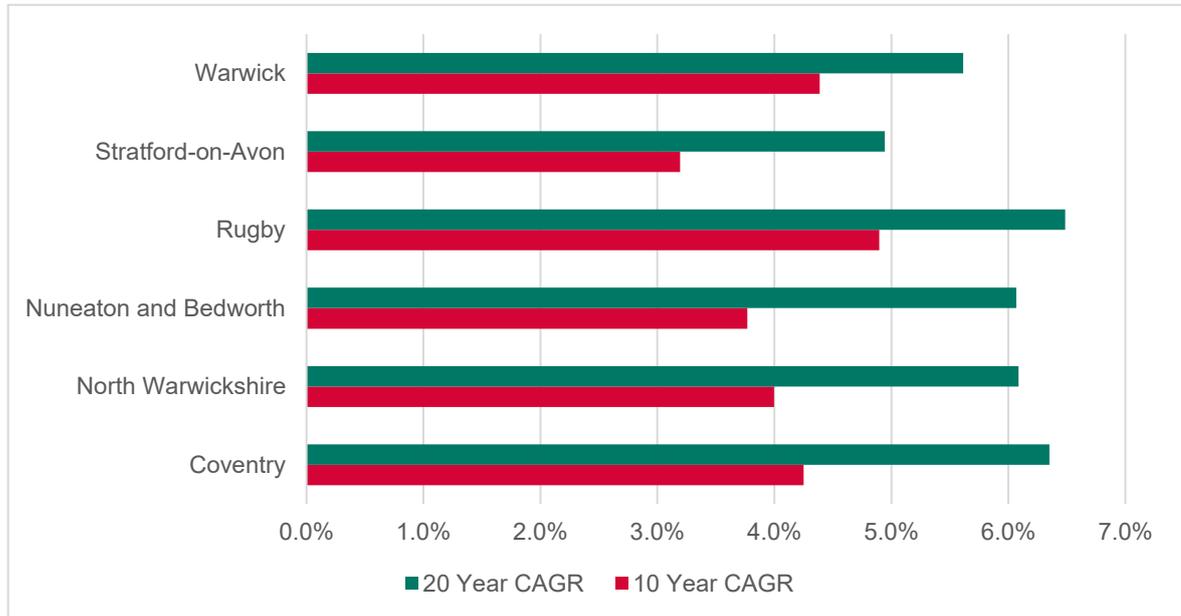
Figure 4.1: House Price Trends in HMA, 2010-2020



Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.5 Within Coventry and Warwickshire, long-term house price growth, looking over the last 20 years, has been strongest in Rugby (at 6.4%+ pa) and weakest in Stratford-on-Avon (4.9% pa). Nuneaton and Bedworth saw particularly strong growth in values over the 2015-20 period (5.7%+ pa).

Figure 4.2: Growth Rates in Median House Prices, to Sept 2020



Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.6 Analysis of actual changes in values also produces interesting results. Over the last 5 years, Warwick and Rugby stand out as having some of the strongest value growth with the median house price growing by £57,750 and £57,500, respectively. In contrast, North Warwickshire, Nuneaton and Bedworth, Stratford-on-Avon and Coventry have all seen value growth that has been weaker than across the West Midlands region, albeit to a moderate degree.

Table 4.1 House Price Growth in C&W Local Authorities

	1 Year	5 Year	10 Year
North Warwickshire	£0	£42,000	£58,000
Nuneaton and Bedworth	£2,500	£45,000	£56,000
Rugby	-£2,500	£57,500	£90,000
Stratford-on-Avon	£0	£47,000	£85,000
Warwick	-£2,750	£57,750	£104,000
Coventry	£3,000	£43,000	£63,000
C&W HMA	£0	£48,700	£76,000
West Midlands	£5,000	£39,000	£52,500

Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.7 Analysis of house prices by type provides a clearer picture of the value geography across the HMA. Warwick District has the highest house prices, with semi-detached properties selling for over £300,000. There are similar values in Stratford-on-Avon with median values for semi-detached

properties at around £272,500 and median values for terraced houses at £235,000. Values in Rugby are lower, with median values for semi-detached properties at £232,000 but still have a higher value than the national average. Coventry, North Warwickshire and Nuneaton and Bedworth are then lower with semi-detached values of around £180,000 - £221,500.

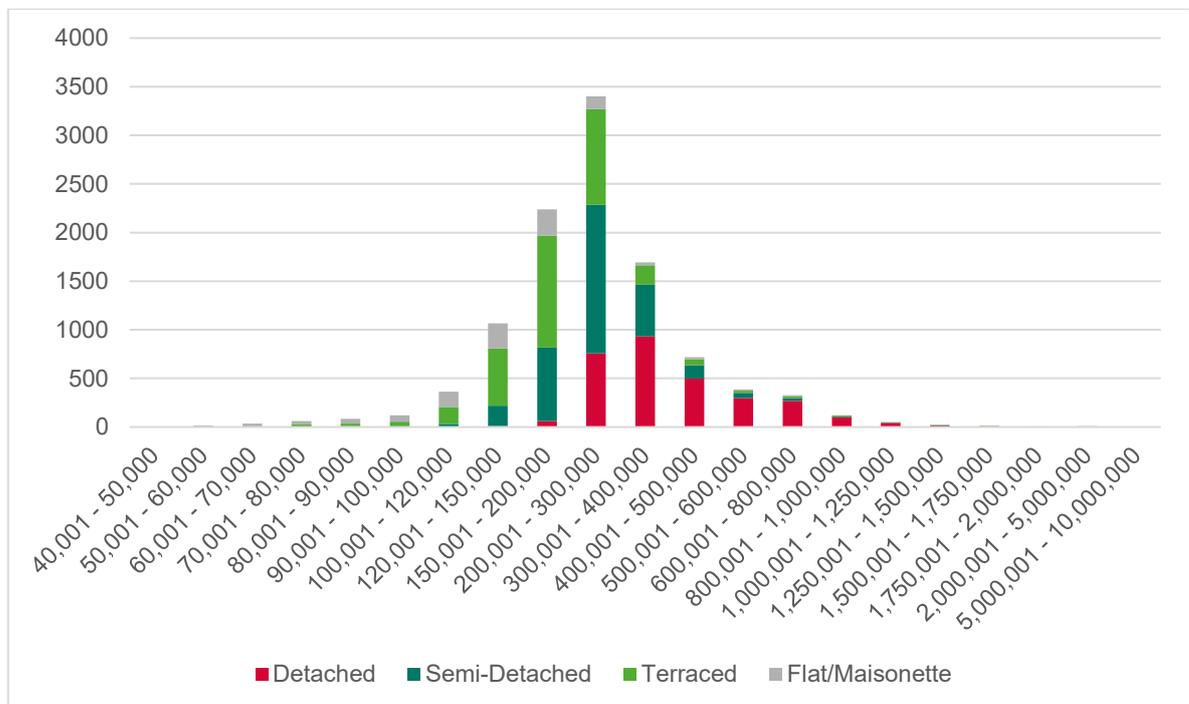
Table 4.2 Median House Prices by Type, Year to Sept 2020

	Detached	Semi-Detached	Terraced	Flat/Maisonette
North Warwickshire	£320,000	£205,000	£159,998	£140,000
Nuneaton and Bedworth	£278,000	£180,000	£138,000	£105,000
Rugby	£350,000	£232,000	£180,500	£122,000
Stratford-on-Avon	£435,000	£272,500	£235,000	£160,500
Warwick	£479,995	£300,000	£270,000	£188,000
Coventry	£313,000	£221,500	£172,000	£128,000
West Midlands	£319,000	£190,000	£159,000	£127,500
England	£350,000	£223,000	£195,000	£216,000

Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.8 The graph below analyses the distribution of property sales by type across the HMA. It shows that most property sales (for the 2020 calendar year) were for properties valued at between £150,000 - £400,000. There is however a level of sales of larger properties – particularly detached – which command higher values still.

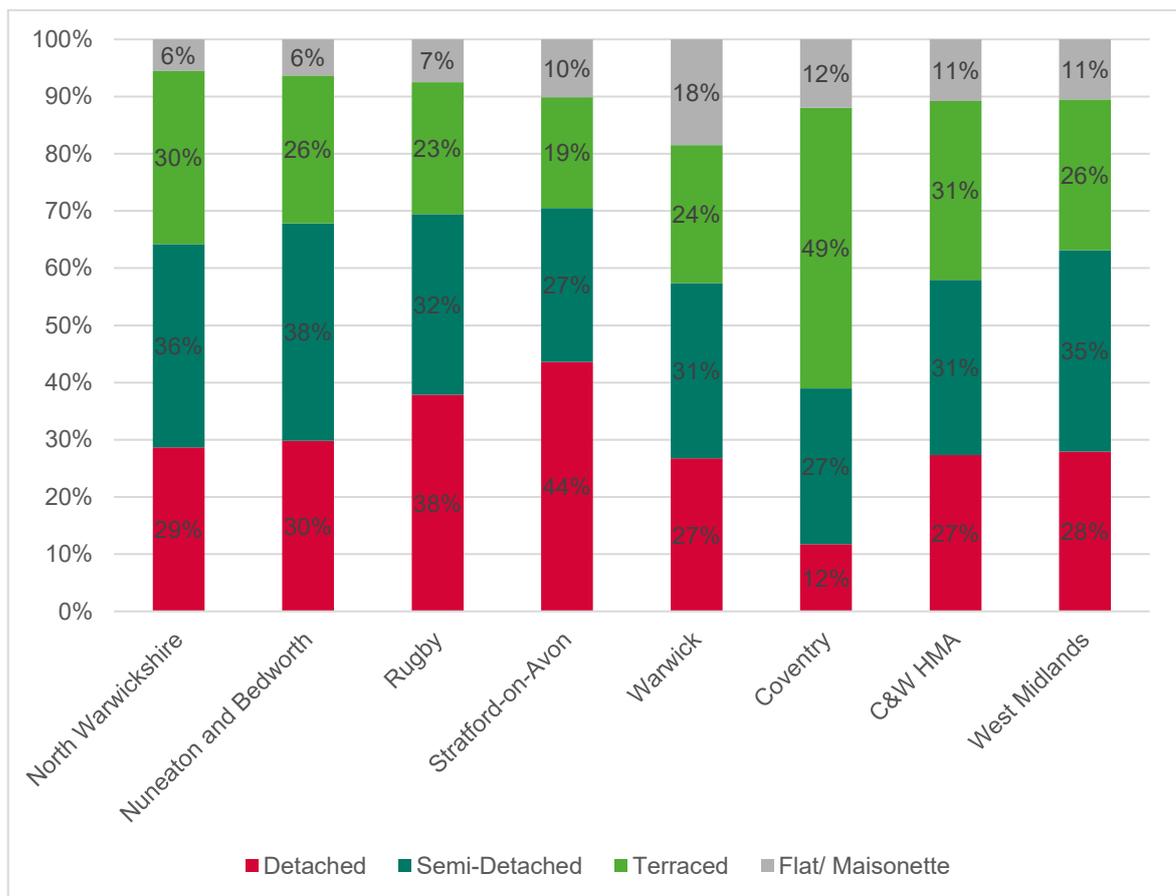
Figure 4.3: Distribution of Sales – Coventry and Warwickshire HMA (2020)



Source: HM Land Registry House Price Index

4.9 The profile of sales by type across the HMA is generally fairly balanced between terraced, semi-detached and detached stock; with a modest volume of flatted sales which accounted for just 11% of sales in 2020. The profile of market demand is thus focused more towards houses. Flatted sales were strongest in Warwick, and to a lesser extent Coventry. Detached sales account for a substantial proportion of overall sales in Stratford-on-Avon District (44%) and Rugby Borough (38%).

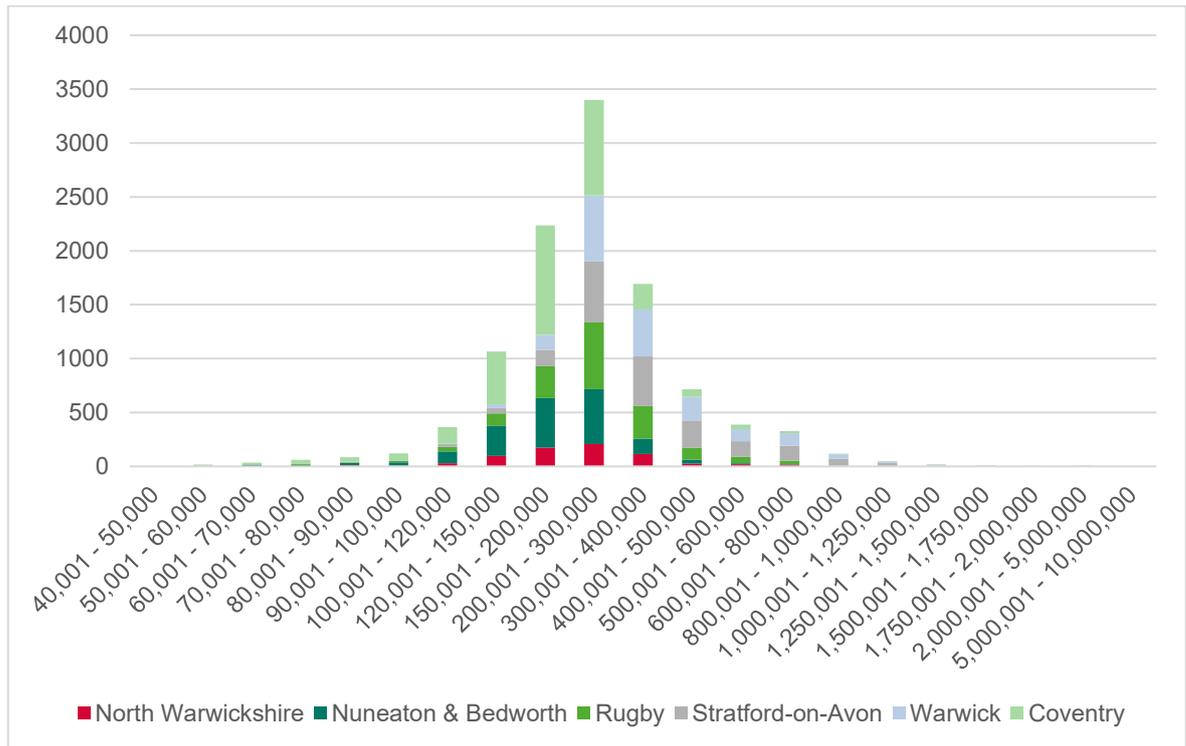
Figure 4.4: Distribution of Sales by Type, Year to Sept 2020



Source: Derived from ONS Small Area House Price Statistics Dataset 6

4.10 The interaction between location and value is shown in the figure below. Sales of properties under £200,000 is focused particularly in Coventry; whereas the majority of sales in Warwick and Stratford-on-Avon District are above this. The distribution of sales in Rugby sits in the middle of those for the sub-region as a whole.

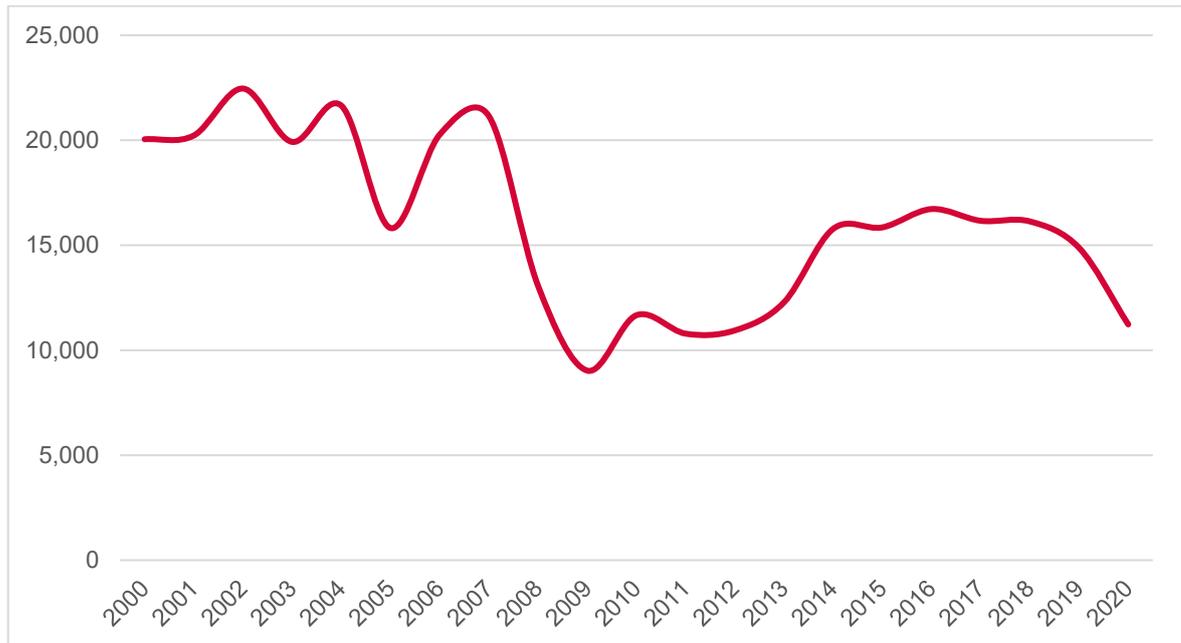
Figure 4.3: Distribution of value of sales by local authority, 2020



4.11 The trend in market housing sales over time highlights the influence of macro-economic factors. A rise in interest rates saw a notable drop in sales in 2005; whilst the onset of the ‘credit crunch’ in 2007 saw a dramatic fall in the ability to access mortgage finance and combined with reduced market confidence and falling values saw a notable drop in sales volumes and market activities between 2007-9. A substantive recovery in market conditions was not seen before 2013, from which point the Bank of England’s Funding for Lending Scheme saw improved mortgage availability; which together with improved economic confidence and the Government’s Help-to-Buy Scheme supported a recovery in the market.

4.12 Sales volumes between 2014-2018 averaged 14,000 a year across Coventry & Warwickshire; which was 40% down on the pre-recession average (pre 2007). Indeed we have seen a decade of lower sales volumes. There are a complex set of factors which appear to have contributed to this, including: a low inflation environment such that inflation is not reducing the value of debt in real terms as it did in previous decades (pre-2000); longer mortgage terms; an ageing population who typically move infrequently; and a policy focus on caring for older persons in their home (resulting in fewer moves). Added to this have been increasing transactional costs of moving, particularly associated with rising values and the costs of Stamp Duty, which have affected both home owners and investors (with 3% additional Stamp Duty applicable to investment purchases from April 2016).

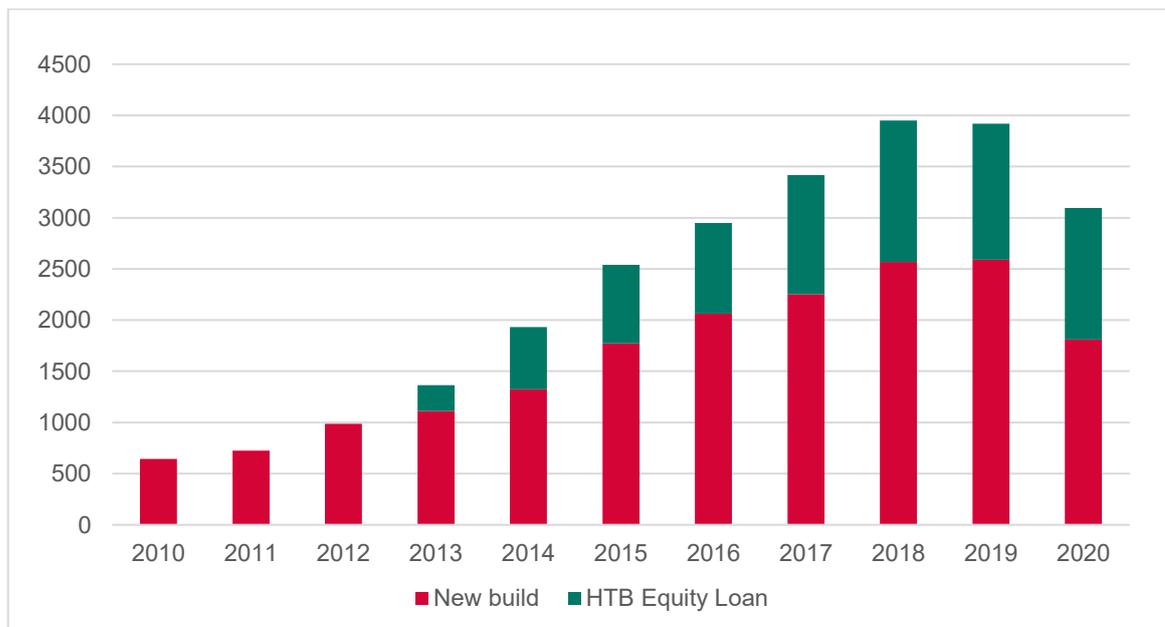
Figure 4.4: Sales Volumes – Coventry & Warwickshire HMA



Source: Derived from ONS Small Area House Price Statistics Dataset 6

- 4.13 The Government’s Help-to-Buy Equity Loan scheme has played an important role in supporting the housing market. Across the HMA it has supported 50% of new-build sales over the last 5 years (to Sept 2020). It will have particularly helped younger households (without existing equity) to buy a home.

Figure 4.5: New-Build Sales in HMA supported by Help-to-Buy Equity Loan Scheme



Source: IcenI Analysis of ONS Small Area House Price Statistics Dataset 6 & MHCLG Help-to-Buy Equity Loan Scheme Statistics

- 4.14 This evidence for individual authorities shows some variance within the HMA, with the lowest proportion of new-build sales supported by Help-to-Buy in Warwick, and Stratford-on-Avon (45%) as less affordable markets for new entrants. North Warwickshire's (48%) supported sales were only a little stronger, while more than half of all new-build sales were supported by equity loans in Rugby (51%) and Coventry (54%). Nuneaton and Bedworth quite clearly outperformed all other local authorities (71%).

Table 4.3 Sales supported by Help-to-Buy Equity Loan in HMA – 5 Years to Sept 2020

5 years to Sept 2020	Overall New-Build Sales	HTB Equity Loan Sales	% Sales Supported
North Warwickshire	509	242	48%
Nuneaton and Bedworth	1,619	1,153	71%
Rugby	2,442	1,248	51%
Stratford-on-Avon	2,978	1,340	45%
Warwick	2,246	1,010	45%
Coventry	3,263	1,772	54%
C&W HMA	13,057	6,801	52%

Source: Icen Analysis of ONS Small Area House Price Statistics Dataset 6 & MHCLG Help-to-Buy Equity Loan Scheme Statistics

- 4.15 Icen's analysis indicates that 87% of those supported by the Help-to-Buy Scheme in the HMA have been First-time Buyers. This rises to 90% in Nuneaton and Bedworth, 95% in Rugby and 97% in North Warwickshire.

Table 4.4 First Time Buyers Supported by Help-to-Buy Equity Loan, to Sept 2020

	HTB Equity Loan Sales	Sales to First-time Buyers	% First-time Buyers
North Warwickshire	255	262	97%
Nuneaton and Bedworth	1,083	1,206	90%
Rugby	1,276	1,346	95%
Stratford-on-Avon	1,147	1,324	87%
Warwick	848	966	88%
Coventry	1,592	2,032	78%
C&W HMA	6,201	7,136	87%

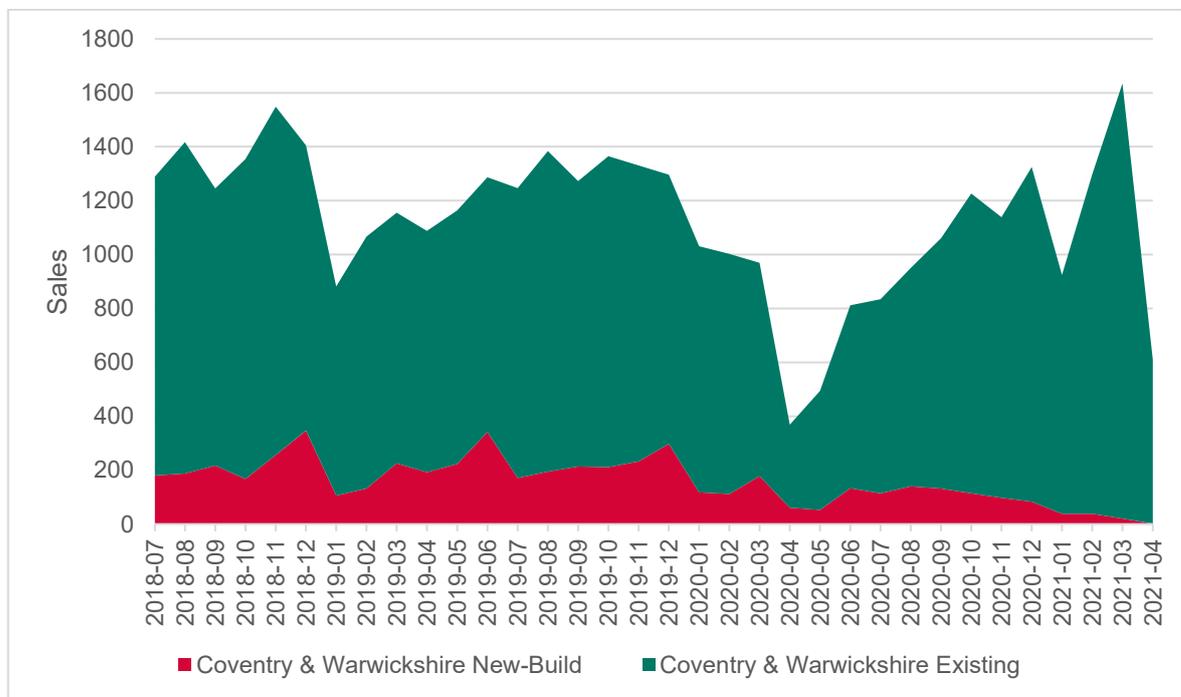
Source: MHCLG Help-to-Buy Equity Loan Scheme Statistics

- 4.16 It is very clear that the Help-to-Buy scheme has played a very important role in supporting First-time Buyers to purchase properties.
- 4.17 A more detailed recent picture of market activity can be gleaned by analysing HM Land Registry monthly data. This shows a particular dip in sales in April and May 2020 influenced by the first Covid-

19 lockdown. Sales volumes however grew through the second half of 2020 recovering to around 1,150+ sales per month; but this remains below longer-term trends and does not point to particular buoyancy within the local markets. As the figure below also shows, there has been a downward trend in new-build sales.

- 4.18 A combination of rising house prices and limited availability of mortgages with higher loan-to-value ratios has been restricting first-time buyer numbers; with first-time buyers also more likely to be younger and affected by the furlough scheme or rising unemployment. There are however signs of the availability of mortgages with a 5% or 10% deposit improving and the Government has provided support through the Mortgage Guarantee Scheme. The change to the Help-to-Buy Scheme may be having some impact.

Figure 4.6: Short-term Sales Volumes – Coventry & Warwickshire HMA



Source: Derived from HM Land Registry House Price Index

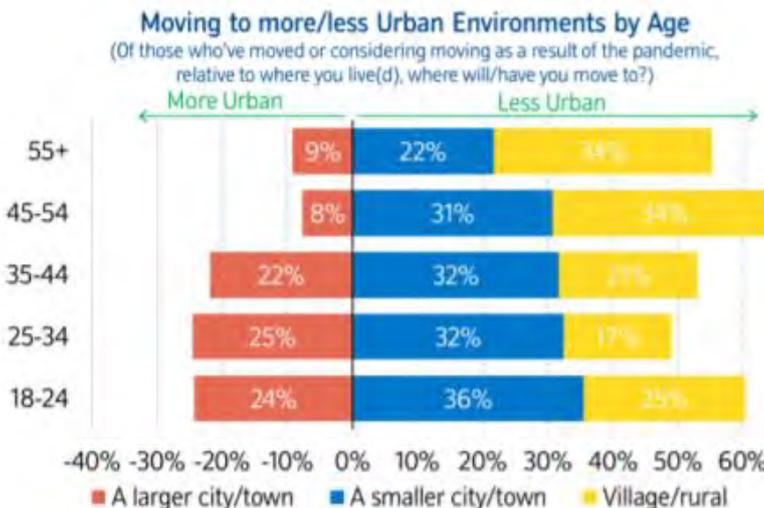
- 4.19 Monthly house price data from the HM Land Registry index shows a month-on-month growth in house prices over the last year, with a growth in average values of around £13,400 in Coventry and £22,500 in Warwickshire over the period from May 2020 (when the market reopened) to March 2021. Strong market conditions appear to have been influenced by a variety of factors including:

- Government support to the market through the Help-to-Buy scheme and the Stamp Duty Holiday, which was due to end in March 2021 but was subsequently extended to June 2021;

- The influence of the pandemic on people’s housing need and choices, from both a growth in home working which is reducing the requirement for being close to a workplace (with evidence that households are looking further from the workplace as a result) to changing space requirements including space to work and a requirement for outdoor space.

4.20 Nationwide reported in May 2021 house price growth of 10.9% over the last year nationally (which accords with our analysis), with values growing at the fastest rate since 2014. Whilst their research suggested that the Stamp Duty Holiday was a factor, three quarters of homeowners surveyed indicated that they would have been moving even if the Stamp Duty Holiday had not been extended. Of those moving or considering a move they found 33% were moving to a different area, whilst nearly 30% were doing so to access a garden or outdoor space more easily. The majority were looking to move to less urban areas, as the chart below shows.

Figure 4.7: Preferences of those looking to move, Spring 2021



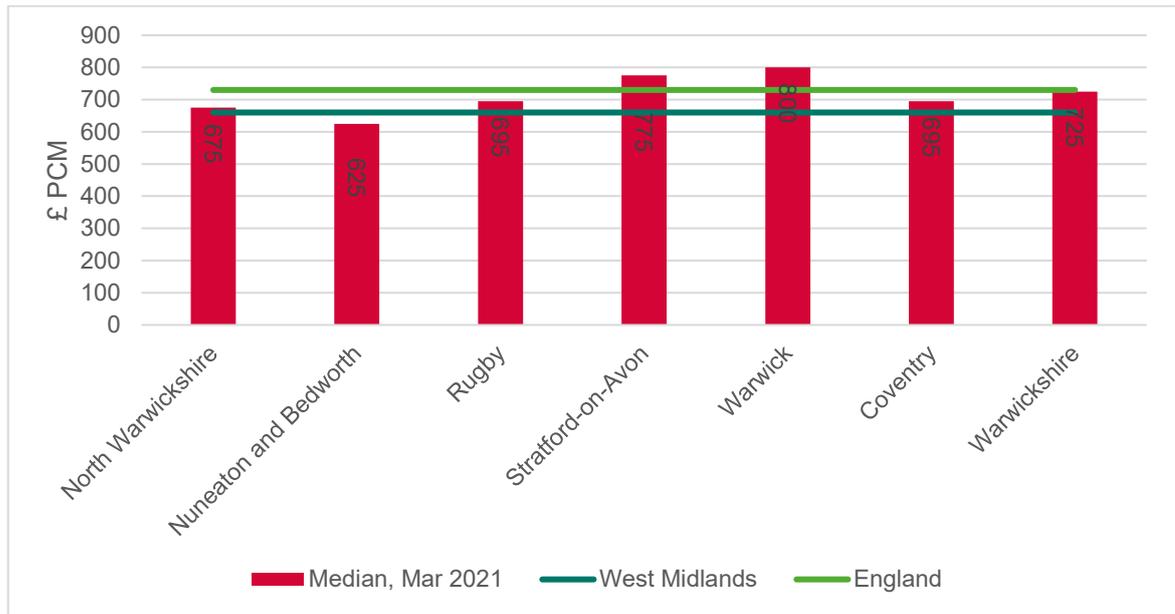
Source: Nationwide House Price Index Press Release, May 2021

4.21 However over a third (36%) of those surveyed also indicated that they were more likely to consider enhancing their home as a result of Covid, with nearly half (46%) of these looking to add or maximise space; and 35% looking to improve energy efficiency or reduce their home’s carbon footprint.

Lettings Market

4.22 Across the Study Area, median rents are slightly higher than the regional average of £660 per calendar month at £725, with median rents in Nuneaton and Bedworth slightly lower than in other areas; and rents the highest in Stratford-On-Avon (£775) and Warwick (£800) per calendar month (higher than the national average).

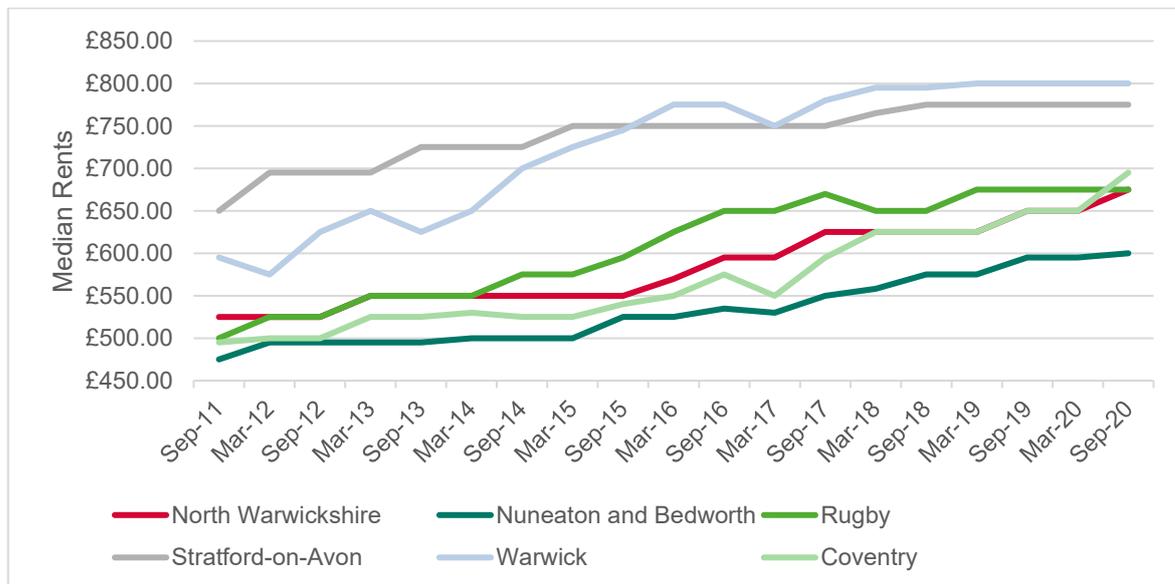
Figure 4.8: Median Rents, Year to March 2021



Source: ONS/VOA Private Rental Market Statistics

4.23 The chart below tracks changes in rental costs over time. Over the period since 2011 the medium-term trend has been of rental growth in line with the regional trend. It is notable however that Coventry has seen stronger relative growth in rents since 2017; albeit that over the period since 2018 rentals have been flat (and on average across the County have fallen slightly).

Figure 4.9: Median Rents, 2011-20



Source: ONS/VOA Private Rental Market Statistics

4.24 The table below considers growth in median and lower quartile (entry level) rents over the last 5 years. The strongest rental growth has been in Coventry, North Warwickshire and Nuneaton and Bedworth over the last 5 years (2014/15 – 2019/20), with notably weaker growth in median rents in Warwick. Lower quartile rents are highest in Stratford-on-Avon; but Coventry has seen the strongest rental growth over the last 5 years by some margin.

Table 4.5 Trends in Median and Lower Quartile Rents

	Median Rent	5 Year Growth		LQ Rent	5 Year Growth
North Warwickshire	£ 675	£ 125		£ 595	£ 100
Nuneaton and Bedworth	£ 600	£ 125		£ 540	£ 90
Rugby	£ 675	£ 80		£ 595	£ 70
Stratford-on-Avon	£ 775	£ 25		£ 700	£ 52
Warwick	£ 800	£ 55		£ 600	£ 50
Coventry	£ 695	£ 155		£ 600	£ 175
Warwickshire	£ 725	£ 75		£ 600	£ 75
West Midlands	£ 650	£ 100		£ 550	£ 100
England	£ 725	£ 100		£ 550	£ 56

Source: ONS/VOA Private Rental Market Statistics

Engagement with Estate and Lettings Agents – Authority Wide

4.25 IcenI has engaged with a number of estate and lettings agents across the HMA to gather information and market insight around house prices, sales, rental values and overall buoyancy to supplement our data analysis from national sources. This engagement took place in **early August 2021**. The sub-sections below deal with each segment of the market in turn.

Sales Market

4.26 This sub-section outlines the key findings of consultation with local housing agents in the district. The agents IcenI engaged with were located in the major towns in Warwickshire. These included Stratford-upon-Avon, Warwick, Royal Leamington Spa, Rugby and Nuneaton. Agents in Coventry were also contacted as well as a few agents in more rural settings of North and South Warwickshire to give a well rounded analysis of the housing market.

4.27 The general findings were that Coventry & Warwickshire’s residential market is extremely buoyant with a wide mix of buyers and the market has seen an influx of interest after Covid-19 restrictions have been lifted. The HMA generally attracts buyers of all ages although there is typically more demand from first time buyers in the northern parts of Warwickshire compared to a demand for larger and more expensive family homes in the south of the HMA.

4.28 There is a trend for buyers to be local. However, there is some demand from Londoners looking to relocate around the commuter towns of Rugby, Nuneaton and Stratford-upon-Avon, as well as from

-
- other cities such as Birmingham and Leicester. The increase in purchasers from outside the HMA were buyers looking for more space and for a cheaper price now that commuter patterns have changed in light of Covid-19, according to the agents we spoke to.
- 4.29 The strongest relative demand at the time of the assessment was for 3-bedroom detached and semi-detached properties. Agents describe there is less demand for flats as people were demanding more space and would like to have gardens. There has been a distinct lack of supply for 3-bedroom homes and an increase in demand for the larger 4-bedroom family homes, certainly in the south of the Authority. Agents suggested buyers were taking advantage of the Stamp Duty Land Tax holiday and therefore seeking higher value properties, but the demand was high as those looking lower down the chain allowed the unlocking of properties further up, as families upsized.
- 4.30 The end of the Stamp Duty Land Tax has not stopped people looking to buy and sell in the market. Many agents noted that people would have moved regardless due to a need for more space, more available cash and flexibility in location with businesses not expecting employees to return to the office full-time.
- 4.31 Across the HMA agents highlighted an acute need for Bungalows, often for elderly people. These plots when they became available were usually sold immediately when they came to market.
- 4.32 There was a lack of investor interest in flats across the area, unless it was in or close to a commuter town centre. Some agents revealed that some flats had failed to sell for some time while on the market.
- 4.33 There were mixed reviews across the HMA in respect of new builds. In Warwick, one sales agent mentioned that there was a general move away from new builds with people preferring character housing. Conversely, in Rugby an agent referred to the 6,200 home new build development of Houlton where the demand is outstripping the supply.
- 4.34 Agents suggested overall demand is greatest for middle range value properties around the £250,000 to £350,000 as people often currently own lower value properties and are looking to move homes and increase the amount spent on a property. However, this varied greatly depending on the area, with North Warwickshire having an overall lower average house price, compared to South Warwickshire. The recent effect of Covid-19 and the subsequent Stamp Duty Land Tax holiday meant there are more buyers of all ages looking to buy in Warwickshire, hence the market is very buoyant. Despite the Stamp Duty Land Tax holiday coming to an end, the market continues to be busy.
- 4.35 All agents agree the residential sales market in the district performed well when Covid-19 restrictions were reduced in Summer/Autumn 2020. However, there has been a distinct lack of stock on the

market to supply this demand in most towns, as properties are being sold particularly quickly compared to the pre Covid-19 housing market with agents having to cap viewings on some properties and the asking price being regularly exceeded. House prices have continued to rise over the past year with many agents highlighting a 7-15% increase across all bands, with 3-bedroom houses showing the strongest growth. Demand has started to slow as the summer holidays begin, but many agents predict a more consistent and stable market to the end of 2021.

Rental Market

- 4.36 Icenl have undertaken market research speaking to local estate agents and letting agents in different parts of HMA to understand local market dynamics in August 2021. This included a selection of agents across Coventry & Warwickshire including, Stratford-upon-Avon, Warwick, Nuneaton, Leamington Spa, Henley-in-Arden and Shipston-on-Stour. Agents indicated the rental market across the whole district is active and has remained consistently busy over the past year with an increase in demand once Covid-19 restrictions were lifted.
- 4.37 More generally the market is varied with people of all ages renting within the authority however there is a definite trend of younger single people, couples and young families looking to rent within the area. Most of those seeking rental properties in Warwickshire live locally or used to live locally and are looking to move back into the area, looking for a return to a more rural life. Some agents highlighted that family rental properties within school catchment areas were in particularly strong demand.
- 4.38 Agents referred to the lack of supply of housing on the sales market leading to families wanting to rent so they could wait until the right property came to market. Some agents referred to the trend of those living in towns near the trainlines that commute out to London and Birmingham for work, such as Nuneaton, Leamington Spa and Rugby. In South Warwickshire a lower proportion of people commute outside of Warwickshire but the area still sees a number of people moving from London, preferring the areas closeness to the Cotswolds.
- 4.39 Coventry and Warwick/Leamington are the only areas with student rental markets, but these have been less busy as many students have opted to stay at home. Many students prefer to rent in the area of Earlsdon (in Coventry) for both the University of Warwick and Coventry University and in Leamington Spa in areas such as the 'Old Town'. Agents in Coventry highlighted that many Asian students continue to rent in the area while studying as well as strong demand from medical students.
- 4.40 Agents in the southern part of Warwickshire covering Shipston-on-Stour, Henley-in-Arden, Warwick and Leamington Spa describe a popular rental market with greater relative demand from younger people often with families seeking 2 and 3 bed properties in particular. However, people of all ages

do rent within the area thus properties of all sizes are popular on the rental market with the exception of flats and properties with no garden.

- 4.41 Agents describe those who live in the towns with train stations such as Nuneaton, Leamington Spa and Rugby utilise the train stations with a percentage commuting out of Warwickshire to go to work. Rural dwellers are more likely to work more locally or from home. Agents describe a very strong rental pre Covid-19, but the demand has increased since Covid-19 leading to a current undersupply of properties on the rental market. Many agents highlighted a desperate need for all kinds of properties and that viewings would have to be capped to prevent an unmanageable amount of applications. The market has remained consistently busy for a number of years and agents expect it to remain so.
- 4.42 Rental values have increased modestly in the previous few years but Covid-19 has quite notably impacted the rental prices as demand outstrips the supply of available properties, especially in South Warwickshire. The average prices for a 2-bed property in the south of the authority is £750- £950 per calendar month. Agents mentioned that the asking price would often be surpassed, particularly for 2-3 bedroom homes.
- 4.43 Similarly, in the northern part of the sub-region covering Coventry, Rugby and Nuneaton agents describe the rental market varied with different ages but there is a focus on students, couples and small families seeking 2 or 3-bed properties; the key driver behind this focus in the market is price orientated, many smaller and therefore cheaper properties are on the rental market, hence couples and young families rent these properties.
- 4.44 Rental values are less than in South Warwickshire with a 2- bed property average rental price of £650-£750 per calendar month. It was suggested there has been an increase in the number of renters due to potential buyers of properties (particularly first-time buyers) being priced out of the sales market by investors and particularly those moving on from their first property, but eager to move out of their family homes. Again, in the northern part of the HMA the rental market is very active often with a greater demand than supply of rental properties.
- 4.45 All agents which we spoke to suggest a strong rental market at the current time across Coventry and Warwickshire often there is insufficient number of rental properties on the market relative to demand, this demand has increased since Covid-19. One agent suggested that tax changes and a surge in the price of houses prompted landlords to sell. This has left to a further deficit in the number of rental properties.

Engagement with Estate and Lettings Agents- Sub-Areas

4.46 Below is a more detailed account from agents on the sales and lettings market in specific sub-areas of Coventry and Warwickshire.

Coventry

4.47 The City is currently active with great demand up to the end of the Stamp Duty Tax relief but has since calmed down. First-time buyers, young families and investors seem to be the most active profile of buyers. The supply could not keep up with demand for the first six months of 2021 and anything below £200,000 was sold immediately.

4.48 Families look to buy and rent 2- and 3-bedroom semi-detached and detached properties within the catchment areas of good schools. There is a good mix of all types of buyers in the area. Students tend to gravitate towards the area of Earlsdon in the South of the City for access to both Warwick and Coventry University. One agent believes the market could get quieter over the next six months.

Stratford-upon-Avon

4.49 Stratford-upon-Avon has an incredibly busy market and has remained so during the pandemic due to its high-end housing market which remains relatively undisrupted. There has been constant demand for 3 to 5-bed properties with families and couples looking to move locally and from London. The number and variety of good public, grammar and comprehensive schools attracts young families as well as access to the outdoors; the Cotswolds being only a short distance away. Access to the A46 and M40 also makes accessing different points of England easy.

4.50 Properties are going for more than asking price and the agents we spoke to have said they have been busier than ever. They mention that any character property up to £800,000 is likely to go quite quickly. This area is particularly hard for first-time buyers due to the high cost of housing in the area and being outbid by cash buyers. Flats and apartments have a harder time of selling. They expect Londoners and city-dwellers to continue to flock to the area in search of more space and prices to continue rising.

Leamington Spa

4.51 Agents have noticed less properties coming to market recently, but demand has been consistently strong in Leamington Spa. There have been a number of first-time buyers and young relocators moving to the area, generally from bigger cities and two agents mention an influx of renters coming from Hong Kong.

4.52 3-bed detached and semi-detached homes are in the most demand with an average property selling for between £350,000-£400,000, a price that has increased by around 10% over the last year. One

agent commented that not many people are bothered about town centre living, preferring space with a garden, although the Victorian terraces and character homes have always sold quickly. Connections by rail into London Marylebone and short distance to the M40 and A46 make Leamington Spa very well connected, and access to good schools and industry make it very attractive.

Warwick

- 4.53 Warwick is no different to the other areas in Warwickshire with an incredibly buoyant market with one agent describing it as a record-breaking year, although things have slowed down over July and August 2021 (agents suggesting this is normal with school holidays). There has been a real mix of buyers from investors to first-time buyers, young professionals and families. A majority are local but perhaps 30 per cent are people from London buying a second home. Apartments are the only type of property that agents are struggling to sell.
- 4.54 The £220,000-£300,000 band is the most active but there has been high demand and a lack of supply for 5-bedroom properties. One agent described there being strong interest in town centre living with access to amenities. A theme across all towns in Warwickshire was the lack of bungalows that came to market and were in very high demand for older people. This was distinctly so in Warwick.

Rugby

- 4.55 Again agents have described an extremely busy period for the market where people are going above the asking prices. There seems to have been a higher demand from first-time buyers in Rugby and investors and a split of 80% are moving locally compared to the other 20% coming from London. Across the board there is demand for all kinds of houses, but perhaps more so for 2 to 3-bed properties.
- 4.56 One agent described how they believed a flood of people looking and selling at the bottom of the market has unlocked the market above them, allowing price bands of £400,000-£500,000 to sell quickly, which have struggled to move in the past. Even flats are selling and prices are very inflated due to the demand. One agent described one property having around 50 viewings when it came to market which is unprecedented. The demand is down to a mix of Stamp Duty Tax relief and a need for movers to find more space and relocate for work.
- 4.57 The new development in Houlton (which is planned for c 6,200 homes) has sold extremely well according to one agent and they can not build them fast enough.

Nuneaton

- 4.58 Nuneaton has remained busy with some slight tail off in the July and August period, but the market has always been consistently busy. There has been a mix profile of buyers but as many as 70% of

are first-time buyers. Young professionals are looking as well as a handful of investors. The bottom of the market seems to be doing better than the higher end, with properties up to £250,000 going very quickly and for over asking price, although one agent said prices have and will remain static. A majority of movers have come from Coventry and Warwickshire, but also from Milton Keynes, Luton and London.

- 4.59 Agents in Nuneaton expect the market to continue to be strong. Demand from Londoners and city-dwellers is expected to continue as Nuneaton has fantastic transport links, good schools and a great community.

Shipston-on-Stour

- 4.60 Agents in Shipston-on-Stour state that the market has been and is very busy but supply has been short in comparison to the strong demand. A lot of first-time buyers have been coming forward as well as agents dealing with those downsizing due to divorces, kids moving out etc. The lower end of the market, however, seems to be weakest with the higher end stuff, which wouldn't sell a year ago, receiving plenty of viewings. The £300,000 to £500,000 is the strongest price band, although there is nothing in the £500,000 to £700,000 range that is coming to market and would be quickly purchased.

- 4.61 The area is particularly attractive for its proximity to the Cotswolds and Oxford and recent investment in the town has led to new restaurants and boutique stores opening. Around 50% of people looking in the area are local while the other 50% are coming from London and either purchasing or buying a second home. New developments in the area are less popular and people are more interested in character properties.

Henley-in-Arden

- 4.62 Another buoyant market according to agents in Henley-in-Arden with all properties selling well with the exception of flats. There is a gap in the market at the higher end of properties where demand is out stripping supply. The buyers have now moved from cash back to the more traditional chain and seem to be moving in from Birmingham or staying local, attracted by the idea of more space and less crime.
- 4.63 Families are the predominant buyers looking for 3 to 4-bed semi-detached and detached housing. Agents expect the market to remain the same until the end of the year. Bungalows have always been in demand by older residents.

PART B: CONSIDERING OVERALL DEVELOPMENT NEEDS

5. DEMOGRAPHIC DYNAMICS AND OVERALL HOUSING NEED

5.1 This section of the report considers overall housing need set against the framework of Planning Practice Guidance (PPG) – specifically the Standard Method for assessing housing need. The section also considers demographic trends; with publication of new 2021 Census data in 2022 it is possible to reset some of the previous population estimates from ONS. The Census is particularly important as ONS had faced some criticism for significantly over-estimating population growth in Coventry and this seems to be confirmed through Census data.

5.2 The Census data has been used, alongside other data, to develop a new trend-based projection for all authorities in the area, which can again be considered within the framework of the Standard Method. Where projections are discussed in this report, the analysis mainly looks at the 2022-32 period (as this fits with the Standard Method) with data generally being shown on an annual basis that can be rolled forward for plan periods post 2032.

Standard Method

5.3 The analysis below considers the level of local housing need for Coventry & Warwickshire having due regard to the Standard Method. The methodology for calculating housing need is clearly set out by Government in Planning Practice Guidance and follows a four-step process worked through in the following sub-sections. We consider first the implications of use of the 2014-based Household Projections, the use of which is mandated by in the Planning Practice Guidance.

Step One: Setting the Baseline

5.4 The first step in considering housing need against the Standard Method is to establish a demographic baseline of household growth. This baseline is drawn from the 2014-based Household Projections and should be the annual average household growth over a ten-year period, with the current year being the first year i.e. 2022 to 2032. This results in household growth of 38,935 households (3,894 per annum) over the ten-year period for the whole of the study area.

5.5 Although this figure is calculated over a ten-year period from 2022 to 2032, Paragraph 12 of the PPG states that this average household growth and the local housing need arising from it can then “be applied to the whole plan period” in calculating housing need.

Step Two: Affordability Adjustment

5.6 The second step of the standard method is to consider the application of an uplift on the demographic baseline, to take account of market signals (i.e. relative affordability of housing). The adjustment increases the housing need where house prices are high relative to workplace incomes. It uses the

published median affordability ratios from ONS based on workplace-based median house price to median earnings ratio for the most recent year for which data is available.

- 5.7 The latest (workplace-based) affordability data is for 2020-based and was published by ONS in March 2021. The Government's Guidance states that for each 1% increase in the ratio of house prices to earnings, above 4, the average household growth should be increased by 6.25%, with the calculation being as follows:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

- 5.8 The ratio varies from 5.96 in Coventry, up to 10.93 in Warwick, giving a range of uplifts from 12%-42%. The specific calculations are set out in Table 5.1.

Step 3: The Cap

- 5.9 The third step of the standard method is to consider the application of a cap on any increase and ensure that the figure which arises through the first two steps does not exceed a level which can be delivered. There are two situations where a cap is applied:

- The first is where an authority has reviewed their plan (including developing an assessment of housing need) or adopted a plan within the last five years. In this instance the need may be capped at 40% above the requirement figure set out in the plan.
- The second situation is where plans and evidence are more than five years old. In such circumstances a cap may be applied at 40% of the higher of the projected household growth (step 1) or the housing requirement in the most recent plan, where this exists.

- 5.10 Only Stratford-on-Avon and Warwick have an affordability ratio above 40%, however in both areas the adopted plans are for higher housing numbers than the Standard Method (730 dwellings per annum in Stratford-on-Avon and 932 in Warwick) – therefore no cap is applied.

Step Four: Urban Uplift

- 5.11 The fourth and final step in the calculation means that the 20 largest urban areas in England are subject to a further 35% uplift. This uplift ensures that the Governments stated target of 300,000 dwellings per annum is met and that “homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable.” (Paragraph: 035 Reference ID: 2a-035-20201216).

- 5.12 Coventry City is listed within the top 20 urban areas in the country it is therefore subject to this additional uplift.

Standard Method Calculation using 2014-based Household Projections

- 5.13 The table below works through the Standard Method calculations and for the whole of the study area shows a need for 4,727 dwellings per annum before the urban uplift; this increases to 5,554 with the inclusion of this uplift, a further 826 dwellings pa in Coventry.

Table 5.1 Standard Method Housing Need Calculations using 2014-based Household Projections

	Coventry	North Warwks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	C & W
Households 2022	154,763	27,351	56,500	46,728	56,445	63,486	405,273
Households 2032	175,801	28,742	60,025	50,968	60,435	68,237	444,208
Change in households	21,038	1,391	3,525	4,240	3,990	4,751	38,935
Per annum change	2,104	139.1	352.5	424	399	475.1	3,894
Affordability ratio (2021)	5.96	8.23	7.73	7.47	10.62	10.73	-
Uplift to household growth	12%	26%	23%	22%	41%	42%	-
Initial need (per annum)	2,362	176	435	516	564	675	4,727
Capped	NA	NA	NA	NA	NA	NA	-
Urban uplift	35%	0%	0%	0%	0%	0%	-
Total need (per annum)	3,188	176	435	516	564	675	5,554

Source: Derived from a range of ONS and MHCLG sources

- 5.14 This is above previous assessments of need. The 2015 SHMA Update identified a need for 4,272 dpa, albeit that this was based on a different methodology as derived from the 2012 NPPF/ 2013 Planning Practice Guidance.

Divergence from the Standard Method (Exceptional Circumstances)

- 5.15 The table above sets out housing need using the Standard Method and whilst this is a relevant consideration Planning Practice Guidance does allow for divergence from these figures (in both an upward and downward direction) where exceptional circumstances can be demonstrated. An important start point is to understand Government Guidance on this topic. This can be found in Planning Practice Guidance 2a and below are some key quotes for the purposes of this document.

“Is the use of the standard method for strategic policy making purposes mandatory?”

No, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.” - Paragraph: 003 Reference ID: 2a-003-20190220

"If authorities use a different method how will this be tested at examination?"

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination. Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method." - Paragraph: 015 Reference ID: 2a-015-20190220 (whole paragraph not replicated)

5.16 The guidance is therefore quite clear: there is an expectation that the 2014-based sub-national household projections (SNHP) should be used but that an alternative approach can be applied where relevant. When using an alternative approach, it is necessary to take account of demographic growth and market signals, but this cannot include using more recent versions of published SNHP. The PPG does not specifically set out examples of exceptional circumstances but it is considered that there are likely to be two main considerations:

- Firstly that demographic data on which projections are based is demonstrably wrong and cannot realistically be used for trend-based projections on which the Standard Method is based; and
- Secondly that demographic trends have changed so much that it is unrealistic to use a set of projections based on information in a trend period to 2014, which is now over 8-years old.

5.17 In summary, this report concludes that both of these factors are relevant. In particular, population growth for Coventry appears to be systematically over-estimated, which leads to trend-based projections that are demonstrably too high. Additionally, there is evidence that more recent trends in population growth (confirmed by Census data) in many parts of Warwickshire have been stronger than in the period to 2014 – mainly due to changes in migration levels – and so the 2014-based figures can be thought of as unreliable. It is also the case that other key aspects of population projections (fertility and mortality rates) have diverged significantly from those projected in the 2014-based projections.

5.18 The analysis below therefore looks at some of the issues around population growth and projections in Coventry and Warwickshire before moving on to look at what might be seen as a reasonable trend-based projection using available information. The focus is particularly on population projections and the report does not seek to challenge the market signals element of the Standard Method with the latest figures published affordable by ONS being used to generate estimates of need.

Reviewing Population Trends

5.19 As noted previously, 2021 Census data was published in 2022 which allows a view of the current population size and age structure in different areas. It is however the case that ONS when developing

population projections tends to draw on its mid-year population estimates (MYE) the latest running to 2020.

- 5.20 The analysis below looks at key data about demographic trends in Coventry & Warwickshire, particularly focussing on past population growth and the components of population change. This allows consideration of whether there are exceptional circumstances and if there is a case for alternative projections to be developed to estimate housing need.

Population

- 5.21 The table below shows ONS estimates for the population by authority in 2020. The population of Coventry & Warwickshire was estimated to be around 963,200 with around two-fifths of people living in Coventry (379,400 persons). Warwick District is the next most populous area.

Table 5.2 Estimated Population by Local Authority (2020) – Coventry & Warwickshire

	Estimated population	% of population
Coventry	379,387	39.4%
North Warwickshire	65,452	6.8%
Nuneaton and Bedworth	130,373	13.5%
Rugby	110,650	11.5%
Stratford-on-Avon	132,402	13.7%
Warwick	144,909	15.0%
Coventry & Warwickshire	963,173	100.0%

Source: ONS MYE

- 5.22 The data above can be contrast with more recent information from the 2021 Census (albeit this is for one year later than the MYE). This shows a much lower population in the HMA than previously estimated with the biggest difference being in Coventry.

Table 5.3 Estimated Population by Local Authority (2021) – Coventry & Warwickshire

	Estimated population	% of population
Coventry	345,300	36.7%
North Warwickshire	65,000	6.9%
Nuneaton and Bedworth	134,200	14.2%
Rugby	114,400	12.1%
Stratford-on-Avon	134,700	14.3%
Warwick	148,500	15.8%
Coventry & Warwickshire	942,100	100.0%

Source: 2021 Census

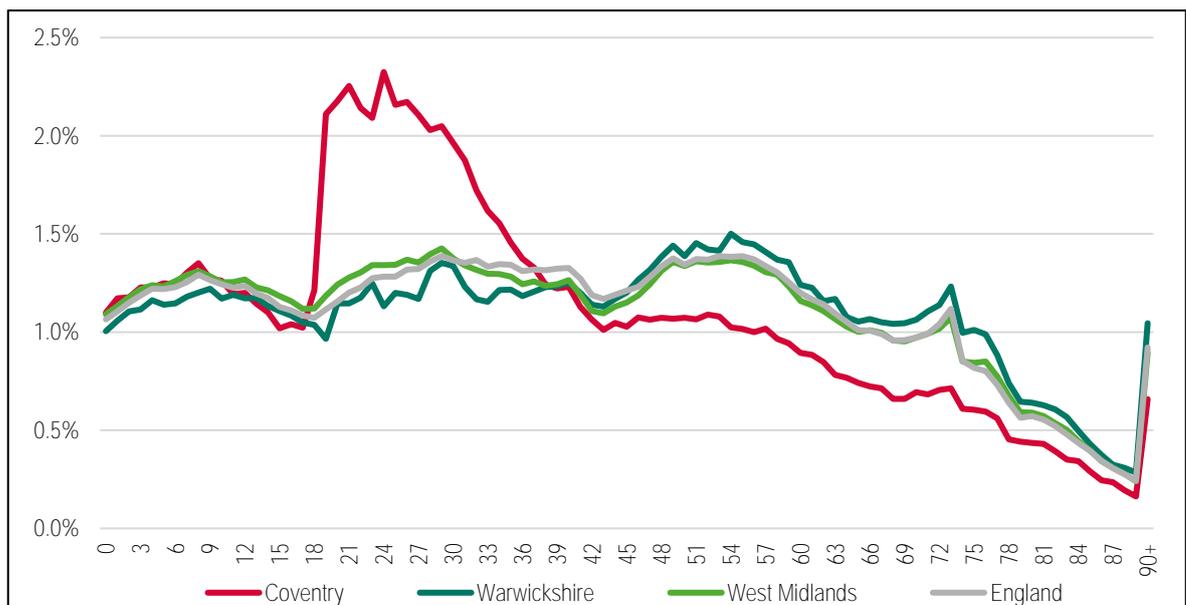
5.23 The analysis below was undertaken prior to publication of 2021 Census data and looked at a range of sources to estimate what the population and age structure of each area in the HMA might be given the likelihood (subsequently confirmed by Census data) that ONS population monitoring through the MYE is substantially wrong. Whilst the analysis below is quite lengthy, it is considered useful to include as it does clearly identify an exceptional circumstance regarding demographic data in the HMA.

5.24 The analysis below finishes by estimating population in 2020, which has then been rolled forward a further year to 2021 to allow for a comparison with the 2021 Census. Census data is then used (along with other demographic data (e.g. about birth and death rates) to construct a trend-based projection, which can then be used within the framework of the Standard Method to estimate housing need across the HMA.

Age Structure

5.25 The figure below shows the population age profile of Coventry & Warwickshire compared with a range of other areas based on the ONS Mid-Year Estimates. For Coventry, the data shows a relatively young age structure in comparison with the regional and national position with Warwickshire having a profile more in line with that seen across other areas. Notably, the proportion of the population in Coventry is lower than seen regionally or nationally for all age groups from about 40 onwards. The City also sees a particular spike of people in their late teens and early twenties which will be related to the student population. It also has a relatively high number of people in their late 20s and 30s.

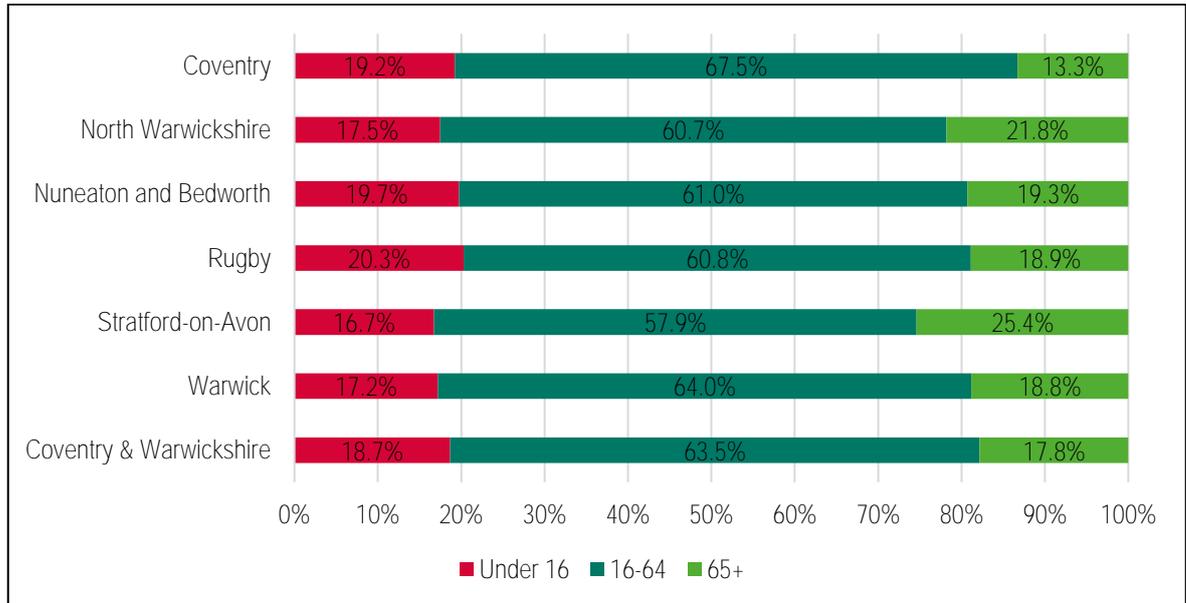
Figure 5.1: Population Profile (2020)



Source: ONS Mid-Year Population Estimates

5.26 The figure below considers the broad age profile by local authority based on the ONS Mid-Year Estimates (MYEs). The analysis shows slightly different are profiles in local authorities in the County, with Stratford-on-Avon having the highest proportion of people aged 65 and over and Warwick seeing the highest proportion aged 16-64 (outside of Coventry), linked to its student population.

Figure 5.2: Population Profile by Local Authority (2019) – Coventry & Warwickshire

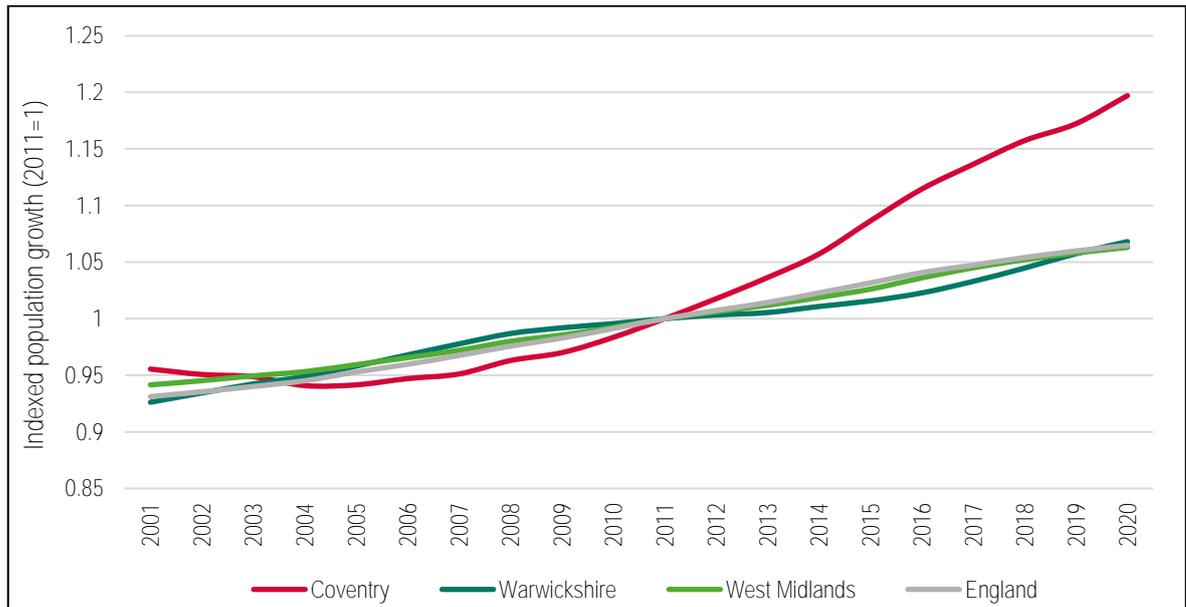


Source: ONS Mid-Year Population Estimates

Past Population Change

5.27 The figure below considers population growth in the period from 2001 to 2020 (indexed to 2011) shown in the ONS MYEs. Over this period that the population of both Coventry and Warwickshire has increased, with the ONS estimates suggesting particularly strong growth in Coventry. In 2020, it is estimated that the population of Coventry had risen by 25% from 2001 levels, with a 15% increase seen in Warwickshire. These figures are in contrast with a 13% rise across the region and 14% nationally. The ONS estimates suggest the population of Coventry has risen by 20% in just the last 9-years.

Figure 5.3: Indexed Population Growth (2001-2020)



Source: ONS Mid-Year Population Estimates

5.28 The table below considers population change over the 9-year period to 2020 (a 9-year period being chosen as the starting point of 2011 has data is likely to be fairly accurate as it draws on information in the Census). The analysis shows over the period that the population of Coventry increased by 19.7% with a 6.8% increase for Warwickshire. For Coventry, this is a high level of population change and compares with increases of 6.3% in the West Midlands and 6.5% across England.

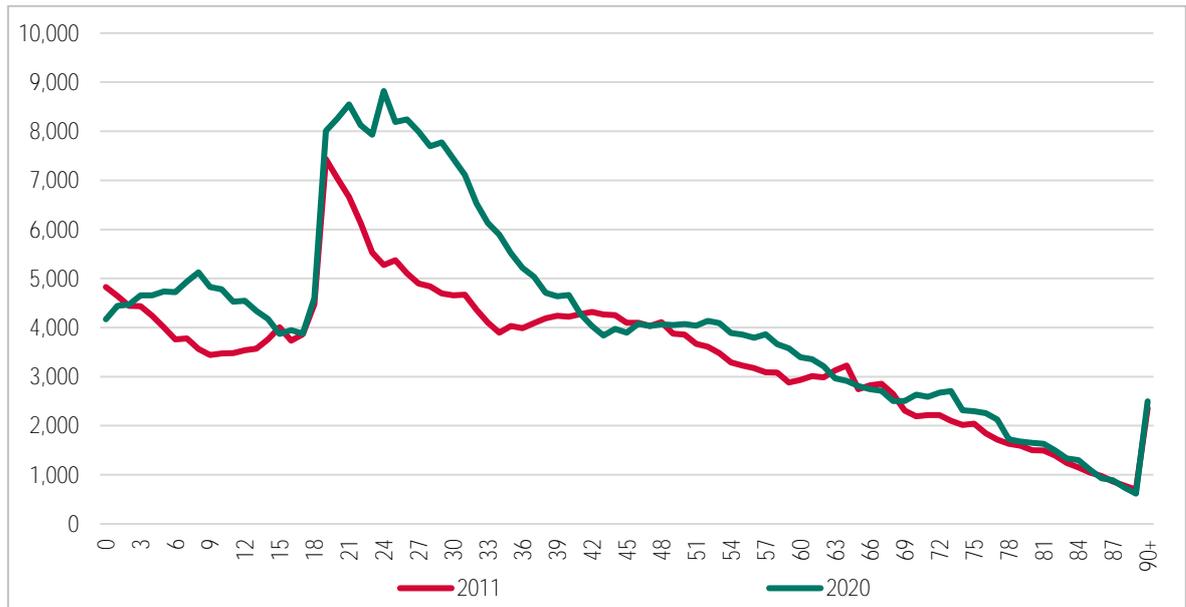
Table 5.4 Population Change (2011-20)

	Population (2011)	Population (2020)	Change	% change
Coventry	316,915	379,387	62,472	19.7%
Warwickshire	546,554	583,786	37,232	6.8%
West Midlands	5,608,667	5,961,929	353,262	6.3%
England	53,107,169	56,550,138	3,442,969	6.5%

Source: ONS Mid-Year Population Estimates

5.29 The figures below show population change by age (again for the 2011-20 period). In Coventry, the analysis suggests there has been a notable change to the age structure with the proportion of people aged in their 20s and early 30s increasing significantly – there has been relatively little change in the number of people in age groups from about 40 onwards. The analysis shows that all of the three broad age bands have seen an increase in population but the 16-64 age band has seen the highest proportionate increase in population, and also the highest increase accounting for 78% of all population increase.

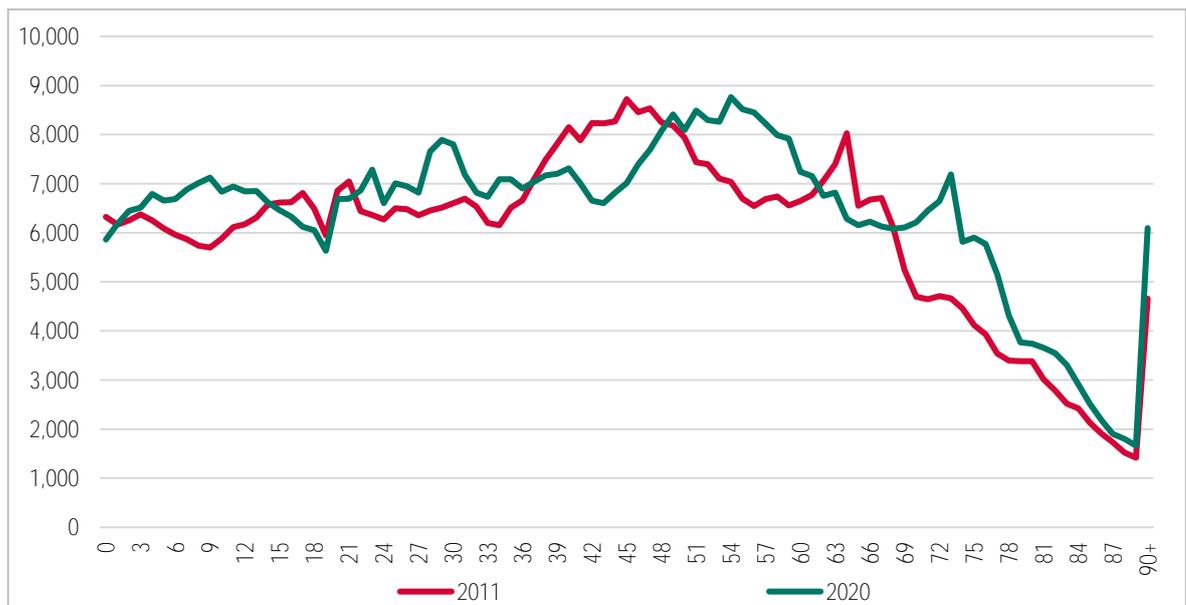
Figure 5.4: Population Age Structure in 2011 and 2020 – Coventry



Source: ONS Mid-Year Population Estimates

5.30 In Warwickshire, there are differences between 2011 and 2020 across many age groups although when looking at the single year of age data it is clear that some of this will be due to cohort effects (such as the high population aged 64 in 2011 developing into a high population aged 73 nine years later). When looking at broad age bands, it can again be observed that all age groups have seen an increase in population. An ageing of the population is notable; the population aged 65 and over increased by 21% over the 9-year period and accounted for over half of all population growth.

Figure 5.5: Population Age Structure in 2011 and 2020 – Warwickshire



Source: ONS Mid-Year Population Estimates

- 5.31 Additional analysis is provided below for individual local authorities. The data shows for the 2011-20 period that all the Warwickshire authorities have seen an increase in population; the highest increase being in Coventry (20%) followed by Rugby (10%). At the other end of the scale, Nuneaton & Bedworth (4%) has seen more modest changes to population.

Table 5.5 Change in Population by Local Authority (2011-20)

	2011	2020	Change	% Change
Coventry	316,915	379,387	62,472	19.7%
North Warwickshire	62,089	65,452	3,363	5.4%
Nuneaton and Bedworth	125,409	130,373	4,964	4.0%
Rugby	100,496	110,650	10,154	10.1%
Stratford-on-Avon	120,824	132,402	11,578	9.6%
Warwick	137,736	144,909	7,173	5.2%
Coventry & Warwickshire	863,469	963,173	99,704	11.5%

Source: ONS

Components of Population Change

- 5.32 The tables and figures below consider the drivers of population change 2001 to 2020. The main components of change are natural change (births minus deaths), net migration (internal/domestic and international) and other changes. There is also an Unattributable Population Change (UPC) which is a correction made by ONS upon publication of Census data if population has been under- or over-estimated. UPC relates to the 2001-11 period.
- 5.33 For Coventry, the data shows a high positive level of natural change throughout the period (i.e. more births than deaths). Internal migration has been quite variable – negative in all years with the data for 2018/19 showing a particularly high number of people (net) moving from the City to other locations. The last five years for which data is available shows an average of about 2,200 people (net) moving from the area to other parts of the United Kingdom. International migration is also variable, although the data does suggest a positive net level for each year back to 2001/2. Over the past five years international migration has averaged about 7,800 people per annum (net).
- 5.34 For Warwickshire, the data also shows a positive level of natural change throughout the period (apart from 2019/20), but at a lower level than seen in the City. Internal migration has been positive in all years (all years apart from 2011/12 and 2012/13) and generally has been on an upward trend over the past decade or so. The last five years for which data is available shows an average of about 4,200 people (net) moving to the area from other parts of the United Kingdom. International migration has also been positive throughout the period studied. Over the past five years international migration has averaged about 1,200 people per annum (net).

5.35 The data also shows a negative level of UPC in Coventry, suggesting that between 2001 and 2011, ONS may have initially *overestimated* population growth within population estimates (and this was corrected once Census data had been published). For Warwickshire, there is a modest positive UPC, suggesting a potential *under-estimate* of population growth in the 2001-11 period.

5.36 The UPC is particularly high in Coventry, where in total over the 10-years to 2011, it appears as if ONS mid-year estimates were a total of 14,900 people different from the actual count in the 2011 Census. For Warwickshire, the discrepancy is 1,700 people in total (in the opposite direction). The findings about UPC are important in the context of the analysis in this section and subsequent Census data as it seems clear that UPC has continued post 2011 and in the case of Coventry actually increased significantly.

Table 5.6 Components of Population Change, mid-2001 to mid-2020 – Coventry

	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	707	-2,566	1,887	-23	-1,514	-1,509
2002/3	672	-1,899	2,109	-14	-1,498	-630
2003/4	847	-2,861	1,005	28	-1,510	-2,491
2004/5	910	-2,280	3,093	-13	-1,498	212
2005/6	1,153	-1,732	3,825	-19	-1,484	1,743
2006/7	1,388	-2,775	4,206	-25	-1,494	1,300
2007/8	1,735	-1,487	4,994	-4	-1,481	3,757
2008/9	1,691	-1,355	3,376	-16	-1,489	2,207
2009/10	2,079	-946	4,668	-33	-1,487	4,281
2010/11	2,252	-774	5,206	48	-1,491	5,241
2011/12	2,078	-992	4,474	29	0	5,589
2012/13	1,872	-596	4,593	50	0	5,919
2013/14	1,929	-264	4,938	-8	0	6,595
2014/15	1,737	-379	7,912	0	0	9,270
2015/16	1,800	-501	7,652	-24	0	8,927
2016/17	1,667	-1,014	6,306	-25	0	6,934
2017/18	1,470	-2,273	7,630	-191	0	6,636
2018/19	1,451	-4,241	7,577	-51	0	4,736
2019/20	1,013	-3,036	9,780	109	0	7,866

Source: ONS

Table 5.7 Components of Population Change, mid-2001 to mid-2020 – Warwickshire

	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	107	3,634	554	-1	204	4,498
2002/3	124	3,425	647	-24	193	4,365
2003/4	361	2,854	121	55	190	3,581
2004/5	508	3,025	1,337	-23	169	5,016
2005/6	496	2,206	2,558	-11	157	5,406
2006/7	1,085	2,592	1,428	-2	219	5,322
2007/8	1,179	1,341	2,345	-6	144	5,003
2008/9	1,168	701	704	5	169	2,747
2009/10	1,294	476	161	-46	150	2,035
2010/11	1,348	690	182	54	114	2,388
2011/12	1,513	-6	268	-9	0	1,766
2012/13	1,090	-488	502	93	0	1,197
2013/14	1,123	433	1,236	141	0	2,933
2014/15	427	966	1,246	65	0	2,704
2015/16	661	1,338	1,768	70	0	3,837
2016/17	502	3,561	1,510	-2	0	5,571
2017/18	208	5,040	963	237	0	6,448
2018/19	504	5,768	617	34	0	6,923
2019/20	-543	5,329	1,027	40	0	5,853

Source: ONS

Accuracy of Population Estimates

- 5.37 It can be seen from the analysis above that the population of Coventry is estimated to have increased at a substantially faster rate than seen across Warwickshire, or indeed for any of the local authorities in the County. The estimates of the population of Coventry have been criticised - most notably by CPRE (Warwickshire) - as being too high and therefore having an impact on future projections (which in turn lead to estimates of housing need).
- 5.38 The analysis below therefore focusses on population growth in Coventry. This has been driven by public discussion of this matter over the past few years, which has included ONS being asked to consider the methods by which they prepare their mid-year population estimates (MYE). Below is a brief overview of some of the context to recent discussions on population estimates. Whilst the focus is on Coventry, it is important for this study to also consider similar issues across the wider Housing Market Area given the migration and housing market interactions between authorities.

CPRE Criticisms of ONS

- 5.39 On the 13th November 2020, Sir Andrew Watson (Chair of CPRE Warwickshire) and others wrote to Ed Humpherson (Director General for Regulation at the Office for Statistics Regulation (OSR)) and Sir David Norgrove on the topic of '*population projections and mid-year population estimates for Coventry*'. In the correspondence it was requested that the United Kingdom Statistics Authority (UKSA) conduct a review of population estimates and projections for Coventry as it was believed that figures had been greatly inflated for Coventry with impacts on planning policy development and decisions being made on the back of bad data.
- 5.40 In particular, and relevant to the HEDNA, it was stated by CPRE that "*projections and associated household projections are used as the basis for forward planning by all local planning authorities, the very high figures for Coventry have led that authority and neighbouring Warwickshire authorities to over-allocate land for housing in their local plans.*"
- 5.41 The correspondence suggests when "*a very wide range of administrative data for Coventry is examined, it fails to show any sign of exceptional growth in the City. All the vital signs of the town – births, deaths, voters, cars registered, pensioners, school admissions, houses built, benefits claimed, A&E attendances, gas and electricity used, and domestic waste produced are completely average for the region*". A copy of correspondence setting out some of the CPRE analysis can be found in a letter dated 13th November 2020.¹⁶
- 5.42 Mr Humpherson first replied to Mr Watson in December 2020¹⁷, noting "*in light of the matters raised within your letter we have decided to undertake a review of the population projections and population estimates produced by the Office for National Statistics (ONS) and how they are used*". This was followed up with the publication of a document "*Review of population estimates and projections produced by the Office for National Statistics*" on the 10th May 2021.¹⁸
- 5.43 That concluded that estimating population is not straightforward and figures are challenging to produce. It was recognised that projections use past estimates and that such data is important in policy making. It was also suggested that ONS takes a sensible approach to population estimates but that they may miss the 'bigger picture' of what the population data informs; it was suggested that ONS should be more open to reflecting any local challenges highlighted and that any feedback should be used to help sense check the official figures. Overall it was concluded that ONS should a)

¹⁶ See <https://www.cprewarwickshire.org.uk/local-planning-matters/coventry-city-council/coventry-news/>

¹⁷ <https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/>

¹⁸ <https://osr.statisticsauthority.gov.uk/publication/review-of-population-estimates-and-projections-produced-by-the-office-for-national-statistics/>

improve methods; b) enhance communication; and c) embrace challenge. The OSR asked for ONS to report back with its plans for addressing the findings in July 2021.

5.44 On the 29th July, ONS published its response setting out a work plan to address the OSR recommendations.¹⁹ ONS recognised that there were concerns about population estimates and projections (specifically mentioning Coventry) and that this can have an impact on household projections and therefore calculations of housing need. **It is notable that both ONS and the OSR have acknowledged issues with the population estimates for Coventry and its impact on the City's calculated housing need.**

5.45 The ONS Report set out a number of recommendations. These included ensuring future population statistics are based on sound methods and suitable data (including a commitment to complete detailed case studies on cities with large student populations and also consider concerns raised about population estimates from administrative data). A further recommendation was to improve the transparency of approaches used and any changes to approaches. The full set of recommendations set out by ONS are listed below:

- R1: Ensuring future population statistics are based on sound methods and suitable data
- R2: Enhancing the transparency of developments concerning the quality of the statistics
- R3: Continuation of plans for the future of migration data
- R4: Enhancement of approach to quality assurance
- R5: Supporting users' understanding of the uncertainty associated with ONS statistics
- R6: Maximising the use of ONS variant projections
- R7: Ensuring that ONS statistics remain relevant to users
- R8: Increasing public value of ONS statistics and supporting their use

5.46 Whilst it is clear that the comments made about population estimates in Coventry have been taken seriously, it is also the case that **at this point no attempts have been made by ONS to amend either population estimates or the projections they feed into.** Indeed the ONS document discusses the use of 2021 Census data to understand how and why the estimates based on Census 2021 differ from those based on the mid-year estimates rolled forward from 2011. Whilst Census

¹⁹

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/futureplansforresearchonpopulationestimatesandprojections/2021-07-29>

data has now been published, and does confirm the population of Coventry to be significantly lower than previously estimated, ONS have not yet released revised MYE or any projections linked to this data.

5.47 Therefore, the situation currently is one where **there are question marks over the components of change data in Coventry but no official alternative**. The analysis set out in the subsequent sections of this report therefore seeks to consider a range of data that might help to provide a view about recent population growth. In doing this the analysis is also mindful of work carried out locally (and drawn on by CPRE in their initial correspondence with the OSR).

5.48 Again, as previously noted, the analysis below was undertaken prior to publication of the 2021 Census, but does help to demonstrate the exceptional circumstances relevant to demographic data for Coventry in particular.

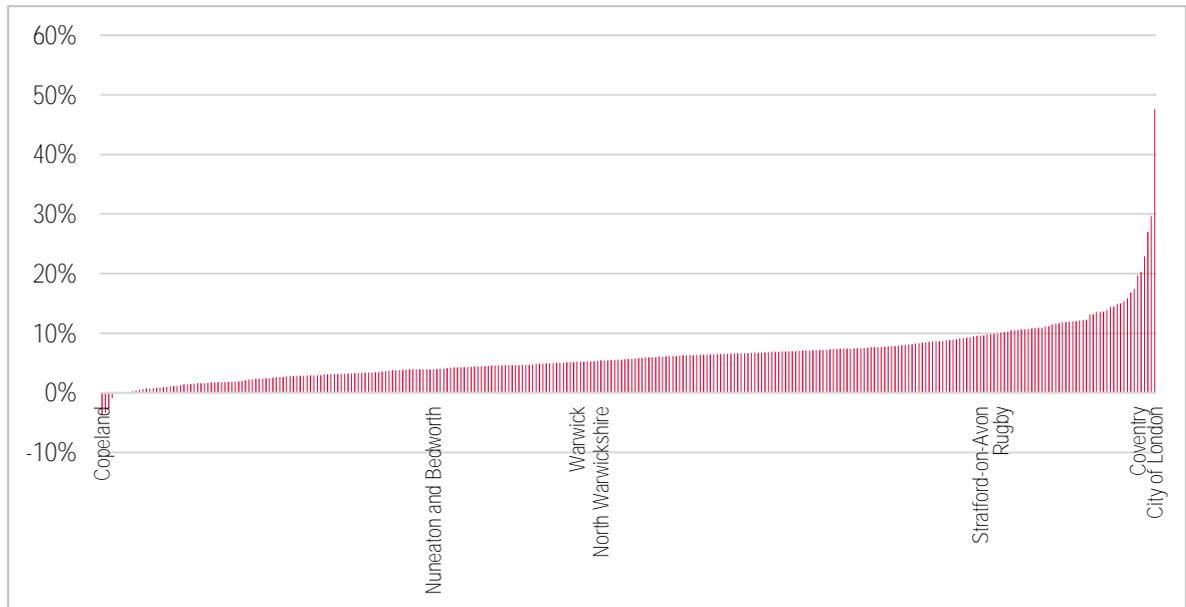
Overall Population Growth

5.49 The first analysis below seeks to put past population growth in Coventry in context with the rest of the country. The figure below shows estimates of percentage population growth for all local authorities in England over the 2011-20 period, with key areas being listed on the figure (including the highest and lowest growth and also the six authorities in this study area).

5.50 Overall, it can be seen that population growth in Coventry is very much at the top end of the scale. Indeed, ONS MYE only estimated five local authorities as having a higher recorded level of population growth than Coventry, and all of these were in Central London (listed below for clarity):

- Islington
- Westminster
- Camden
- Tower Hamlets
- City of London

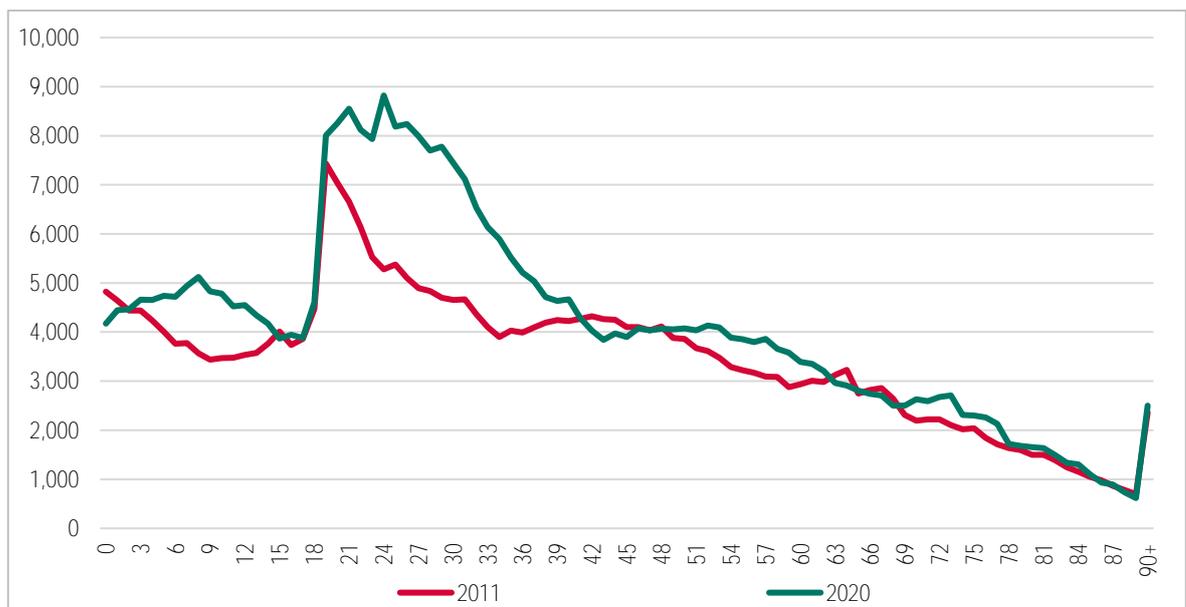
Figure 5.8: Estimated % Population Growth (2011-20) – all local authorities in England



Source: ONS MYE

5.51 It is of interest to understand which age groups have driven the population estimates. The main growth is thought to have been in age groups from about 20 onwards. Given the number of students in Coventry it looks as if ONS have recorded students and young people moving into the City, but not then recorded them moving out. It is possible that Coventry has seen a greater retention of students but at first glance the change from 2011 to 2020 does not look realistic.

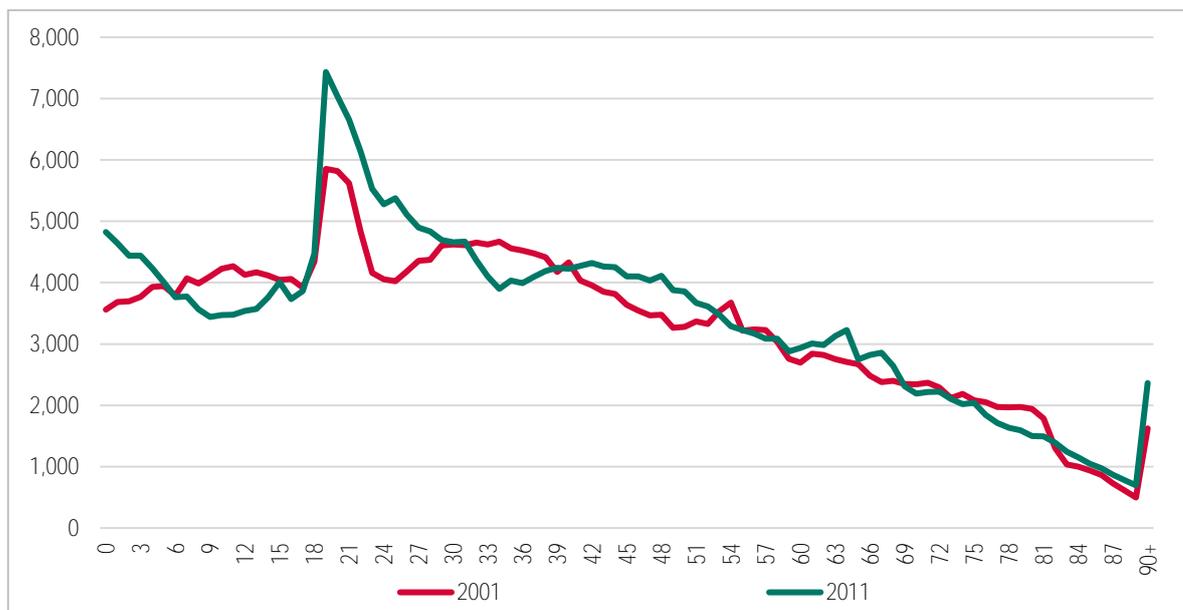
Figure 5.9: Population Age Structure in 2011 and 2020 – Coventry



Source: ONS Mid-Year Population Estimates

5.52 Firstly to look at this issue, analysis has been carried out to look at comparative population in the 2001-11 period. Data for 2011 will be data fixed by reference to the Census and should therefore have a reasonable degree of accuracy. When focussing on student age groups it can be seen that the general age structure in both 2011 and 2011 is similar, albeit in 2011, the number of people in key age groups is higher. Data for both 2001 and 2011 does point to a clear patterns of students moving to the City and then the majority leaving soon after their studies finish. It does however show growth of people in their 20s and in the 40s (with younger children) over the 2001-11 decade.

Figure 5.10: Age Structure (2011-20) – Coventry



Source: ONS Mid-Year Population Estimates

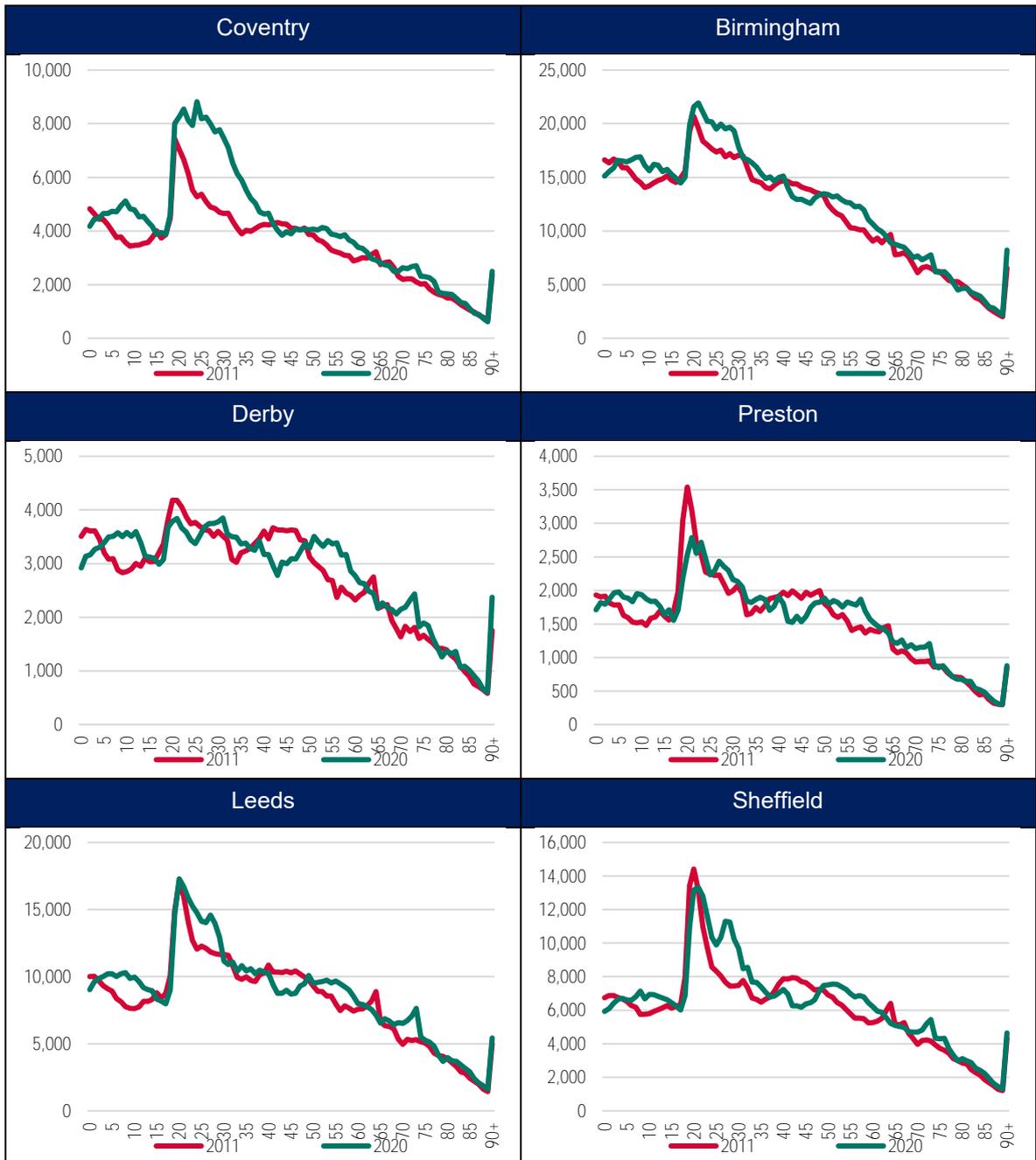
5.53 It is perhaps more interesting to compare Coventry with other similar authorities. Following the 2011 Census, ONS provided a list setting out the most similar authorities (in socio-economic terms) for each area. For Coventry, the most similar authorities were considered to be:

- Derby
- Preston
- Leeds
- Birmingham
- Sheffield

5.54 Whilst the ONS classification of similar is not just regarding student populations, it is the case that the five authorities listed above do all have notable student populations and can be considered as reasonable comparators.

5.55 The figure below plots the age structure in 2011 and 2020 for each of the above authorities (plus Coventry). From this it can be seen that **the projected age structure changes shown in Coventry are really quite different from any other location**. For all other areas there is a clear trend of students moving to the area and then leaving following completion of studies (although there does appear to be some degree of retention, albeit not on the scale seen in Coventry). This does point to there being a problem with the data for Coventry.

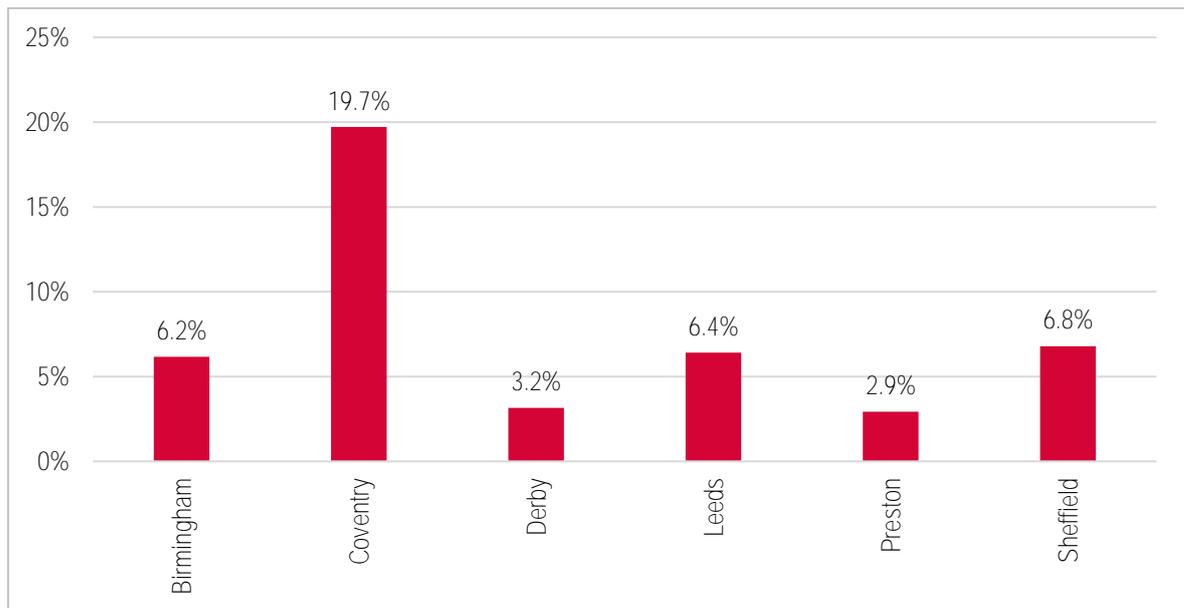
Figure 5.11: Estimated Population Change in Coventry and other 'Similar' Areas



Source: ONS Mid-Year Population Estimates

5.56 The figure below shows the overall estimated population growth in the 2011-20 period in each of the similar areas. This clearly shows population growth in the City has been substantially above that recorded in any other area. Indeed, at 19.7%, population growth is nearly three times the next highest area (Sheffield at 6.8%). Whilst it is clearly possible for Coventry to be growing faster than other locations, the differences are stark; given the comments above about how the age structure is estimated to have changed, there must be serious doubts about the validity of this level of population growth.

Figure 5.12: Population Growth (2011-20) in Coventry and 'Similar' Areas



Source: ONS

5.57 It would be theoretically possible that the population of Coventry has increased by as much as is estimated due to a high level of housebuilding, (i.e. if homes are provided then it provides an opportunity for people to move to the area and/or for people to remain living in the area). The table below shows that of the similar areas, Coventry does indeed have the highest net change to its dwelling stock, increasing by 8.6% over the 9-year period. However, unlike population estimates, this is not a substantially different level of dwelling growth to those seen in a number of the other similar cities. Preston saw stock increase by 7.5% but ONS has only recorded a 2.9% population increase. In Sheffield (which has the next highest level of population growth) dwelling stock has increased by 6.4%, lower than in Coventry, but a much smaller difference when compared with population data.

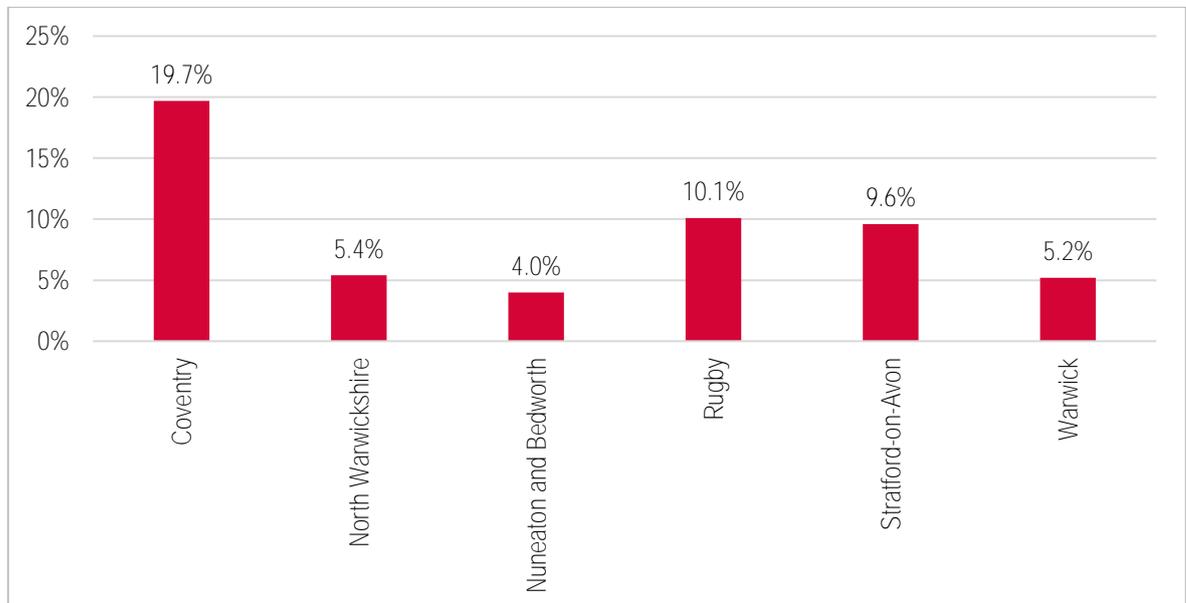
Table 5.8 Dwelling Stock Growth (2011-20) – Coventry and ‘Similar’ Areas

	Birmingham	Coventry	Derby	Preston	Leeds	Sheffield
2011	423,633	132,891	106,509	60,337	331,819	236,811
2012	424,820	133,803	106,770	60,513	333,750	237,244
2013	426,192	134,782	107,143	60,613	335,308	238,005
2014	427,790	135,871	107,590	60,774	337,537	238,922
2015	429,599	136,980	108,018	61,289	339,516	240,687
2016	432,438	138,386	108,502	61,773	341,990	242,276
2017	434,189	139,515	109,291	62,577	344,814	244,524
2018	437,349	140,610	110,078	63,315	347,097	246,828
2019	441,536	142,109	110,687	64,100	350,524	248,804
2020	445,276	144,350	111,227	64,847	353,857	251,887
Change (11-20)	21,643	11,459	4,718	4,510	22,038	15,076
% change	5.1%	8.6%	4.4%	7.5%	6.6%	6.4%

Source: MHCLG Live Table 125

5.58 As well as looking at Coventry compared with ‘similar’ areas, our analysis has looked across the HMA with the figure and table below showing population growth and the dwelling stock change. As with the previous comparison, the data for Coventry looks to be out-of-kilter with population growth being roughly double the next highest area (Rugby) but yet the change in dwellings is higher in three of the areas (Stratford-on-Avon, Rugby and Warwick).

Figure 5.13: Population Growth (2011-20) across Coventry and Warwickshire



Source: ONS

Table 5.9 Dwelling Stock Growth (2011-20) – Coventry and Warwickshire

	Coventry	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on-Avon	Warwick
2011	132,891	27,033	54,167	43,192	54,781	60,427
2012	133,803	27,115	54,406	43,520	54,936	60,563
2013	134,782	27,153	54,685	43,854	55,304	60,728
2014	135,871	27,208	54,838	44,249	55,634	60,952
2015	136,980	27,408	55,240	44,681	56,342	61,576
2016	138,386	27,616	55,652	45,215	57,400	62,201
2017	139,515	27,942	56,052	45,596	58,619	63,261
2018	140,610	28,169	56,549	46,174	59,955	64,160
2019	142,109	28,506	57,197	47,113	61,363	65,121
2020	144,350	28,721	57,816	47,984	62,705	66,157
Change (11-20)	11,459	1,688	3,649	4,792	7,924	5,730
% change	8.6%	6.2%	6.7%	11.1%	14.5%	9.5%

Source: MHCLG Live Table 125

Electoral Register

- 5.59 A further piece of analysis is to look at the number of people on the Electoral Register. Given that the ONS MYE suggest that much of the population growth in Coventry is of people aged 16 and over, it might be expected that the number of people registered to vote would also have increased.
- 5.60 The tables below show the number of people on the register and compares this with a number of other areas – the first table compares Coventry with Warwickshire and England, with the second table showing data for each of the individual local authorities. The first table shows that the number of people registered in Coventry has actually fallen in the 2011-20 period, whilst for Warwickshire there was a 5.4% increase, this is a higher increase than seen nationally.

Table 5.10 Persons on Electoral Register (2011-20) – Coventry, Warwickshire and England

	Coventry	Warwickshire	England
2011	227,296	410,420	38,654,024
2012	226,540	415,204	38,837,344
2013	221,669	411,458	38,597,137
2014	214,724	407,881	37,831,553
2015	210,031	401,316	37,399,942
2016	215,348	413,640	38,386,864
2017	214,219	419,347	38,693,859
2018	211,069	416,110	38,371,414
2019	218,047	420,800	39,476,140
2020	217,818	432,462	39,860,421
Change (11-20)	-9,478	22,042	1,206,397
% change	-4.2%	5.4%	3.1%

Source: ONS

5.61 When looking across local authorities it can be seen that most have seen an increase in the Electoral Register, including over 10% increase in the case of Warwick. North Warwickshire saw a small decline, but much lower than the decline recorded for Coventry. Again this evidence points to population growth in Coventry as being likely to be somewhat lower than recorded by ONS. The growth in those on the electoral roll in Warwick in comparison looks high relative to the population growth shown in the ONS MYEs.

Table 5.11 Number of people on Electoral Register (2011-20) – Coventry and Warwickshire Authorities

	Coventry	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on-Avon	Warwick
2011	227,296	49,788	94,713	72,426	95,227	98,266
2012	226,540	49,987	95,735	73,069	96,193	100,220
2013	221,669	49,456	94,069	73,362	96,494	98,077
2014	214,724	48,520	92,436	73,393	95,396	98,136
2015	210,031	47,339	90,571	71,187	94,292	97,927
2016	215,348	48,761	93,023	73,539	97,284	101,033
2017	214,219	48,994	94,409	74,005	97,272	104,667
2018	211,069	48,511	93,870	73,330	97,515	102,884
2019	218,047	48,421	94,623	74,224	99,096	104,436
2020	217,818	49,542	96,134	75,851	102,450	108,485
Change (11-20)	-9,478	-246	1,421	3,425	7,223	10,219
% change	-4.2%	-0.5%	1.5%	4.7%	7.6%	10.4%

Source: ONS

The Patient Register

- 5.62 A further source of population estimates is the Patients Register (PR). The table below shows estimated population growth in both the MYE and the ONS Mid-Year Estimates (MYEs).
- 5.63 For Coventry that the MYE is showing a notably higher level of population growth than the PR. This is the complete opposite to the trend seen in all other areas. Generally, in the 2011-20 period the PR shows proportionate population growth that is about 50% higher than the MYE, but in Coventry the PR is about 25% lower. This would again potentially point to population estimates in Coventry being over-estimated, this area is clearly out-of-line with the other studied.
- 5.64 It will also be noted that the PR consistently shows a higher population than the MYE, this is to be expected as the PR is reliant on people unregistering with a GP when joining a new one. Therefore the actual levels of population should be treated with some caution, but the growth trends can be seen as indicating relative changes across areas.

Table 5.12 Comparing ONS Mid-Year Population Estimates with Estimates of Population from the Patient Register

		2011	2020	Change	% change
Coventry	MYE	316,920	379,430	62,510	19.7%
	Patient Register	344,060	397,000	52,940	15.4%
Warwick-shire	MYE	546,560	583,820	37,260	6.8%
	Patient Register	563,960	623,250	59,290	10.5%
West Midlands	MYE	5,608,680	5,961,970	353,290	6.3%
	Patient Register	5,807,710	6,350,570	542,860	9.3%
England	MYE	53,107,200	56,550,160	3,442,960	6.5%
	Patient Register	55,312,750	60,870,990	5,558,240	10.0%

Source: ONS

- 5.65 The table below shows the same information for each of the local authorities in the HMA. In all cases (apart from Coventry) the PR shows higher estimated population growth, although there are some differences in terms of the gap between the two.

Table 5.13 Comparing ONS mid-year population estimates with estimates of population from the Patient Register – local authorities

		2011	2020	Change	% change
Coventry	MYE	316,920	379,430	62,510	19.7%
	Patient Register	344,060	397,000	52,940	15.4%
North Warwks	MYE	62,110	65,520	3,410	5.5%
	Patient Register	63,580	67,380	3,800	6.0%
N & B	MYE	125,440	130,410	4,970	4.0%
	Patient Register	129,220	139,780	10,560	8.2%
Rugby	MYE	100,500	110,670	10,170	10.1%
	Patient Register	103,290	119,120	15,830	15.3%
SoA	MYE	120,830	132,410	11,580	9.6%
	Patient Register	127,540	141,480	13,940	10.9%
Warwick	MYE	137,760	144,910	7,150	5.2%
	Patient Register	140,350	155,600	15,250	10.9%

Source: ONS

5.66 Additionally on the topic of the Patient Register it is worth briefly considering if the trends seen in Coventry are simply due to the nature of the area and the table below shows the same analysis as above, but with comparisons to the 'most similar' authorities. Again it can be seen that all areas (apart from Coventry) see higher estimated growth in the Patient Register than the MYE. This would point to this being a specific issue for Coventry rather than being linked to the type of area (e.g. an area with a large student population).

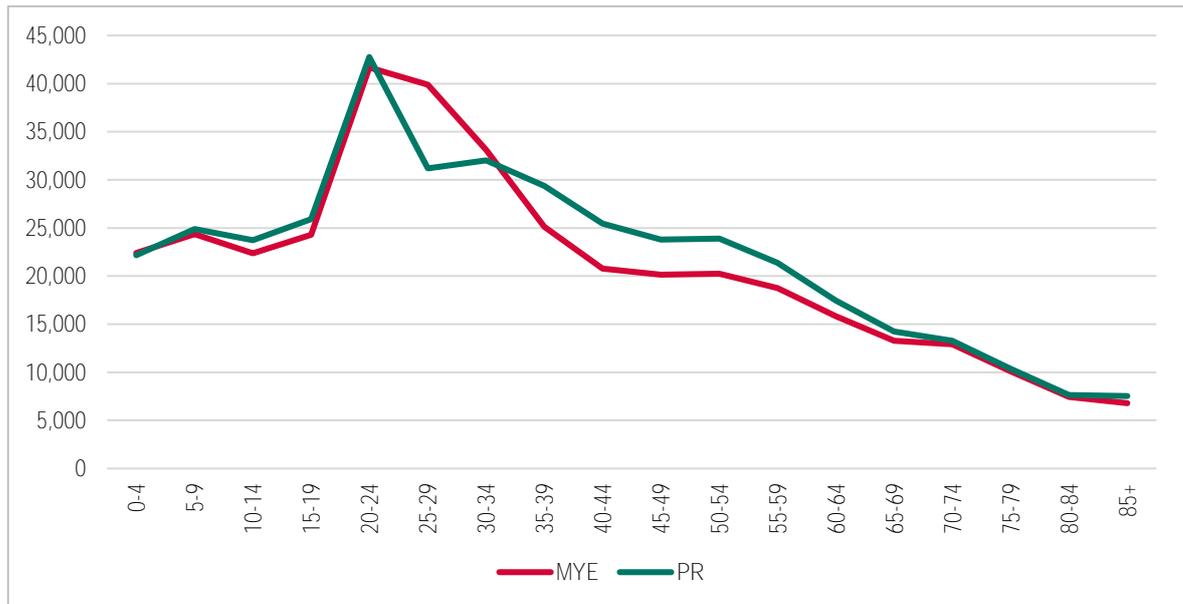
Table 5.14 Comparing ONS Mid-Year Population Estimates with estimates of Population from the Patient Register – Coventry and similar areas

		2011	2020	Change	% change
Coventry	MYE	316,920	379,430	62,510	19.7%
	Patient Register	344,060	397,000	52,940	15.4%
Birmingham	MYE	1,074,290	1,140,550	66,260	6.2%
	Patient Register	1,146,670	1,297,090	150,420	13.1%
Derby	MYE	248,950	256,860	7,910	3.2%
	Patient Register	262,310	284,070	21,760	8.3%
Leeds	MYE	750,700	798,790	48,090	6.4%
	Patient Register	806,180	889,560	83,380	10.3%
Preston	MYE	140,070	144,160	4,090	2.9%
	Patient Register	149,480	162,590	13,110	8.8%
Sheffield	MYE	551,770	589,240	37,470	6.8%
	Patient Register	563,220	612,270	49,050	8.7%

Source: ONS

5.67 Finally, analysis is provided below to look at the age structure of the population in each of the MYE and PR (for 2020). This is shown in the figure below which shows the PR has a higher population estimate for most age groups; the main exception to this is for people aged 25-29, where the PR is some 8,700 people lower (for the 30-34 age group there is an 1,100 difference). This does strongly support earlier suspicions, in that the MYE is recording people coming into the area (notably students) but has then not been very good at recording them moving out again.

Figure 5.14: Comparing estimated age structure in 2020 – Coventry (MYE and Patient Register)



Source: ONS

Other Comments on Population Dynamics in Coventry

5.68 The analysis above has looked in some detail at a range of sources to see if there is evidence of the population of Coventry as having been over-estimated in the 2011-20 period, and it is fair to say that all of the sources would support that conclusion. Below are a few further layers of analysis which also investigate this.

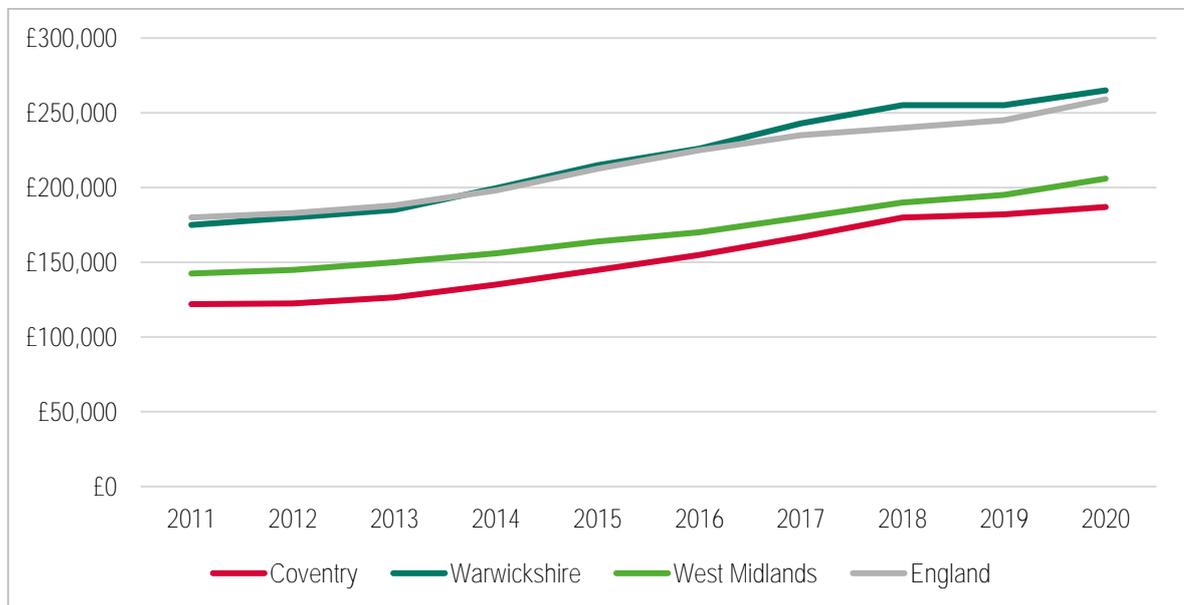
Continuation of UPC

5.69 Analysis earlier on in this section has noted that in the period from 2001 to 2011 ONS had to make a significant correction to their population estimates to bring them back in-line with the 2011 Census. In the 2011-20 period, ONS reduced previous estimates by a total of 14,946 people (1,495 per annum). Given the analysis above, it seems possible that the UPC error may have persisted beyond 2011, and indeed the Census has confirmed this (UPC potentially running at around 4,000 per annum in the 2011-21 period – see analysis below). The continuation of UPC would see a much lower estimated population in 2020 than currently in the MYE.

House Prices

5.70 If the population of Coventry has grown as significantly as suggested by ONS, but with a relatively limited supply of new homes (as measured by the dwelling count) then it is possible that pressure on the housing stock would have seen above average increases in house prices. The figure and table below show changes to the median house price from 2011 to 2020 in Coventry and a range of other areas. Over this period, the average price of a home in the City rose by 53%, which is actually slightly higher than seen in other locations. However, in actual cost terms the price increase is lower than seen across Warwickshire or nationally (and virtually identical to the West Midlands). Coventry remains in 2020 a more affordable place (in terms of average prices) than any of the comparison areas. This analysis again points to estimates of population potentially having been over-estimated.

Figure 5.15: Median House Prices (2011-20)



Source: ONS Small Area House Price Statistics (using HM Land Registry data)

Table 5.15 Median House Prices (2011-20)

	2011	2020	Change	% change
Coventry	£122,000	£187,000	£65,000	53%
Warwickshire	£175,000	£265,000	£90,000	51%
West Midlands	£142,500	£206,000	£63,500	45%
England	£180,000	£259,000	£79,000	44%

Source: ONS Small Area House Price Statistics (using HM Land Registry data)

Housing Register

5.71 A further analysis looks at the number of households on the Council's Housing Register (households seeking affordable housing). It is possible with the high estimated population growth and limited housing delivery that more households would seek social/affordable housing. However, as can be

seen from the table below, the number of people on the register is lower in 2020 than it was in 2011; this is likely in part to be due to changes in allocation policies and therefore it is perhaps more interesting to note that register figures have been fairly stable (slightly declining) since 2014. This analysis suggests that whatever population growth Coventry has seen, it has not put any additional pressure on the social housing stock.

Table 5.16 Number of Households on Housing Register in Coventry

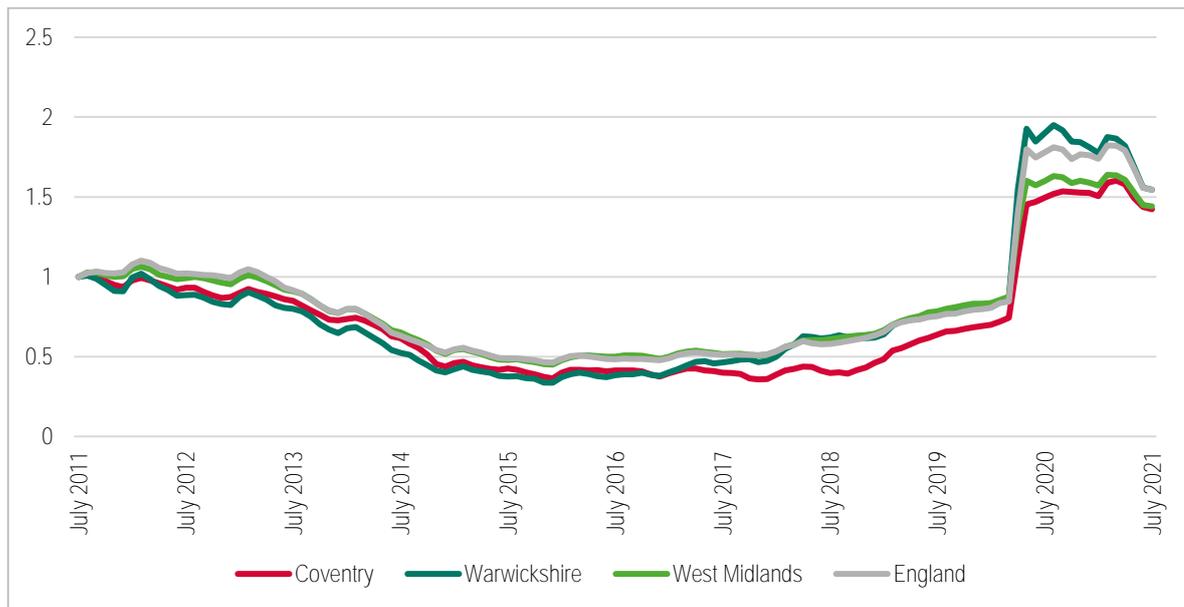
	Number of Register
2011	20,460
2012	22,718
2013	12,079
2014	14,360
2015	14,051
2016	14,030
2017	14,223
2018	13,632
2019	13,768
2020	13,608

Source: MHCLG Live Tables

Claimant Unemployment

5.72 Analysis has also been undertaken to look at Claimant Count data (described as the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit who are out of work). In an area where population has been growing strongly, it might be expected that the number of claimants would also be increasing relative to other locations (if not then relative unemployment would be improving). As the figure below shows, the number of claimants in Coventry has broadly tracked that of other areas and in fact is now slightly lower (data has been standardised as of July 2011). This analysis again points to population growth in Coventry as not being exceptional.

Figure 5.16: Standardised number of out-of-work benefit claimants (2011-2021)



Source: ONS

Implications

- 5.73 The analysis above has looked at a range of sources to provide an indication of whether or not population growth in Coventry has been exceptional, and it is clear that none of the sources suggest that to be the case. It has previously been noted that CPRE undertook their own analysis of this issue, and this covered many of the analyses shown above. In addition, the CPRE work considered gas and electric use, school admissions, car registrations, A&E attendance and household waste. This report does not seek to replicate the CPRE analysis, but it is worth noting that all of the work carried out again points to population growth in Coventry as having been less significant than suggested in the ONS MYE – a point subsequently confirmed by the 2021 Census.

Estimating Coventry's Population in 2020

- 5.74 The analysis above clearly points to estimates of population in Coventry as having been over-estimated in the period since 2011 – a point confirmed by the 2021 Census. However, none of the sources accessed provide an alternative figure. Providing an accurate estimate of trends is more challenging, and the below analysis therefore works and seeks to triangulate through a number of alternatives to test what the population (and age structure) might be. It should again be noted that the analysis below was completed prior to publication of the 2021 Census, but has been included as it does provide a comparative position.
- 5.75 From the range of secondary data sources two methods were used to develop a population estimate. These are:

-
- a) Linking to dwelling completions as noted that population growth in Coventry (from the MYE) looks to be very high when set against the more modest level of completions with other data (e.g. house prices) not suggesting that there is now an additional imbalance in the housing market. Therefore analysis has been developed to look at what level of population growth might have occurred given the number of additional homes delivered.
 - b) Linking to the Patient Register – generally there seems to be a fairly consistent relationship between estimates of population growth in the PR and the MYE, with all areas studied in this report showing higher proportional growth in the Patient Register. The exception to this is Coventry, where the opposite pattern is recorded. An estimate of population for Coventry has been made using the PR data by applying both the regional and national relationship between PR and MYE

Estimates based on Dwelling Completions

- 5.76 In this method a population projection has been developed that starts with the MYE as published (data on births, deaths and migration) but allows for the underlying levels of migration to flex so as to provide a different level of population growth. Data from both the 2014- and 2018-based subnational household projections (SNHP) has been applied (data about household representative rates and institutional population) – this allows an indication of the level of household growth that might be expected and to this a standard vacancy allowance (of 3%) is applied to derive estimates of the change in the number of dwellings.
- 5.77 The first analysis looks to see what level of dwelling completions the MYE as published could have supported and it will be remembered from earlier that Coventry has seen a dwelling increase of 11,459 in the 2011-20 period. Modelling the MYE gives dwelling growth of 23,200 (linking to the 2018-SNHP) and 25,900 (linking to the 2014-SNHP). Clearly it is possible that the household representative rates in both of the SNHP releases are substantially wrong, but the difference in these figures is significant and is likely to a considerable degree be linked to an over-estimation of population in the City.
- 5.78 The alternative analysis looks at what population growth might have occurred if the SNHP is reasonable and 11,459 additional dwellings have been provided (see Table 5.10). For this, migration levels in the MYE are adjusted so that dwelling growth is equal to this figure. This provides two estimates of the population in 2020 as set out below:
- Linked to 2018-SNHP = 347,941
 - Linked to 2014-SNHP = 341,929

5.79 Clearly this method is still giving a range of suggestions about population, but in both cases the estimate is some way below the 379,387 in the MYE for 2020.

Patient Register

5.80 For the Patient Register analysis account is taken of the relationship regionally and nationally between the PR and the MYE. It will be remembered at a regional level that the PR showed a 9.3% population increase and the MYE was 6.3% - therefore the MYE is about 67% of the PR. At a national level the equivalent figures were 10.0% and 6.5% giving a ratio of around 65%.

5.81 For Coventry, and to get an idea of likely population in 2020, the estimated population (for 2020) in the Patient Register data is multiplied by each of the regional and national ratios to give an idea of population. The estimated figures are:

- Linked to regional data = 349,781
- Linked to national data = 348,381

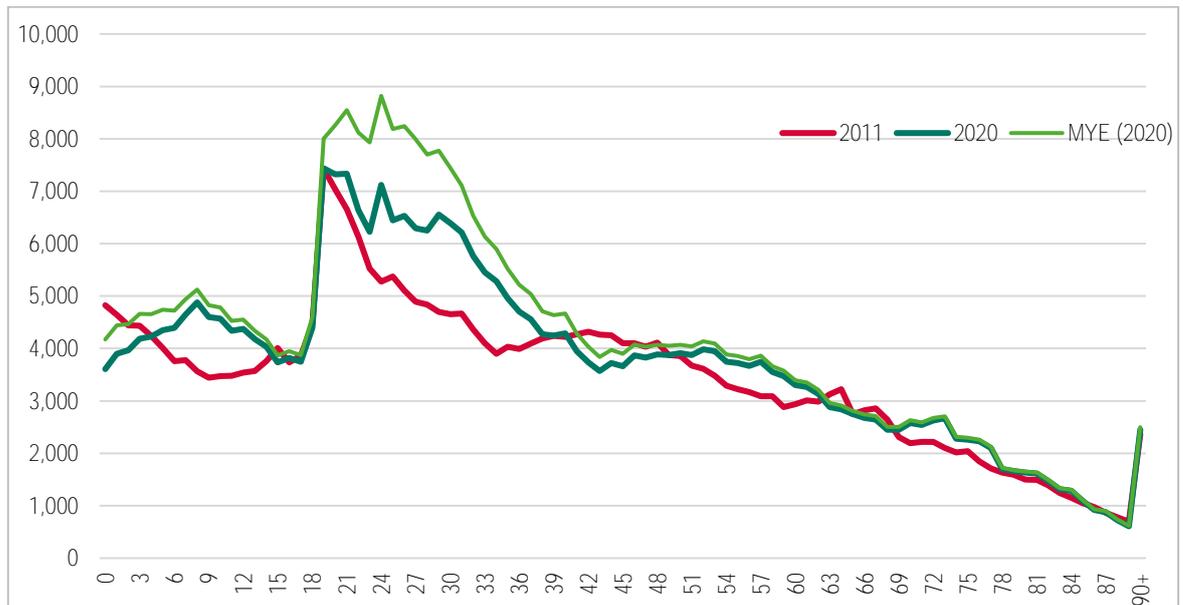
5.82 As with the estimates made from applying a projections method, the population estimated through this method is somewhat lower than the ONS MYE and it is also notable that these estimates are similar in scale to the upper end of the figures derived from the dwelling-led projection methodology.

Overall Estimate

5.83 The scenarios above provide a set of parameters for Coventry's population in 2020. It does not seem reasonable to pick any one of these scenarios as preferable to another and therefore for the purposes of this report a simple average of the four has been used as a best estimate of the population of the City. Therefore, it is estimated that the population of Coventry in 2020 is 347,000.

5.84 At this level of population a different age structure is generated when compared with the MYE and the figure below shows this estimated structure (and set against the MYE). One notable feature is that the retention of people in their 20s (likely to be linked to students) is significantly diminished and overall it is considered that this age structure looks more plausible and is more in-line with that seen in other 'similar' areas.

Figure 5.17: Age structure of estimated population of Coventry in 2020 – contrast with 2011 and the MYE (for 2020)

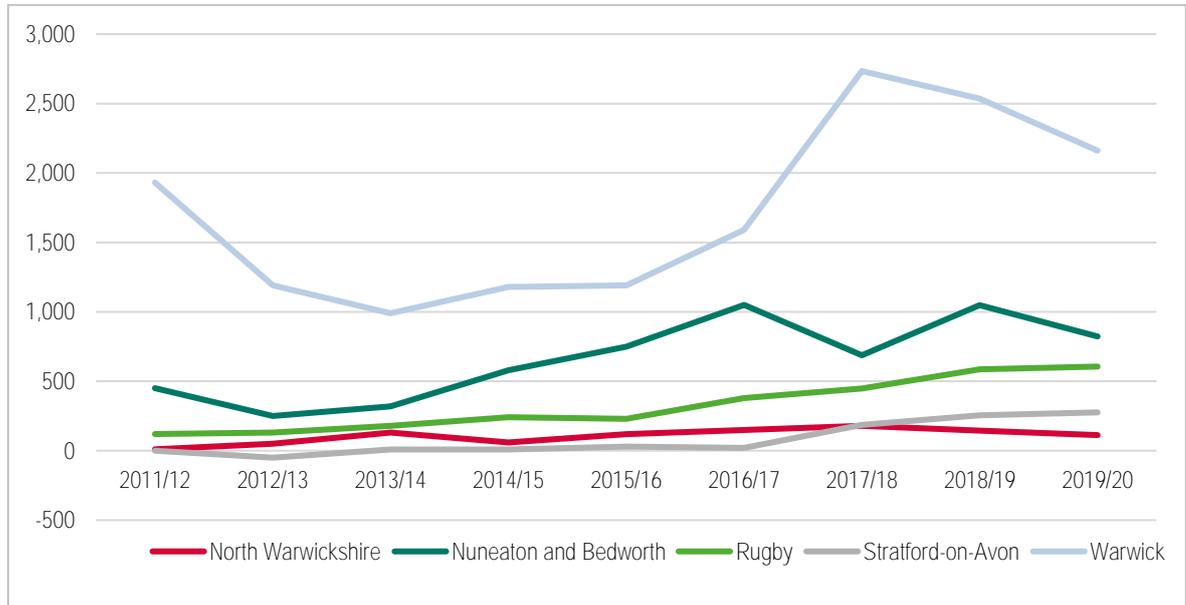


Source: ONS and demographic modelling

Population Estimates Across Warwickshire

- 5.85 Whilst this analysis has focussed on Coventry, it is also important to consider estimates of population in the other local authorities of the HMA. In particular, if the population of Coventry is over-estimated because ONS is failing to record people leaving the area then it is possible that those areas to which people are moving will have an under-estimated population.
- 5.86 The figure below shows levels of net migration from Coventry to each of the 5 Warwickshire local authorities, this should be treated as providing an indication of the strength of relationships rather than as actual figures (as it seems from the data above that moves from Coventry may well have been under-estimated). The figure shows that the strongest relationship is with Warwick, which has seen the highest level of net in-migration from Coventry for all years studied, this is followed by Nuneaton & Bedworth, although migration to this area is nowhere near as significant as for Warwick.

Figure 5.18: Estimated net migration from Coventry to each of the local authorities in Warwickshire



Source: ONS

5.87 Following the same methodology as for Coventry a series of population estimates for each of the Warwickshire authorities have been derived. The table below shows these estimates along with the original figures from the MYE (and also data for Coventry). Overall, it is estimated that the population of Coventry is around 32,400 people lower in 2020 than shown in the MYE; however, it is also estimated that the population of Warwickshire is likely to be slightly higher than the MYE (8,200 more people) – most of the difference in Warwickshire is accounted for by a higher population in Warwick.

Table 5.17 Estimated population of local authorities in Coventry & Warwickshire in 2020

	MYE (2020)	Estimated (2020)	Difference
Coventry	379,387	347,008	-32,379
North Warwickshire	65,452	64,878	-574
Nuneaton & Bedworth	130,373	132,093	1,720
Rugby	110,650	111,385	735
Stratford-on-Avon	132,402	134,063	1,661
Warwick	144,909	149,586	4,677
Coventry & Warwickshire	963,173	939,013	-24,160

Source: JGC Estimates

5.88 To provide some context, the table and figure below set out the percentage population growth the above figures amount to and also for comparison the proportionate increase in dwellings. Whilst there would not be expected to be a perfect relationship between dwelling growth and population change, some relationship can be expected. It is therefore notable that generally, the revised population figures do seem to be bringing dwelling growth and population growth more in-line.

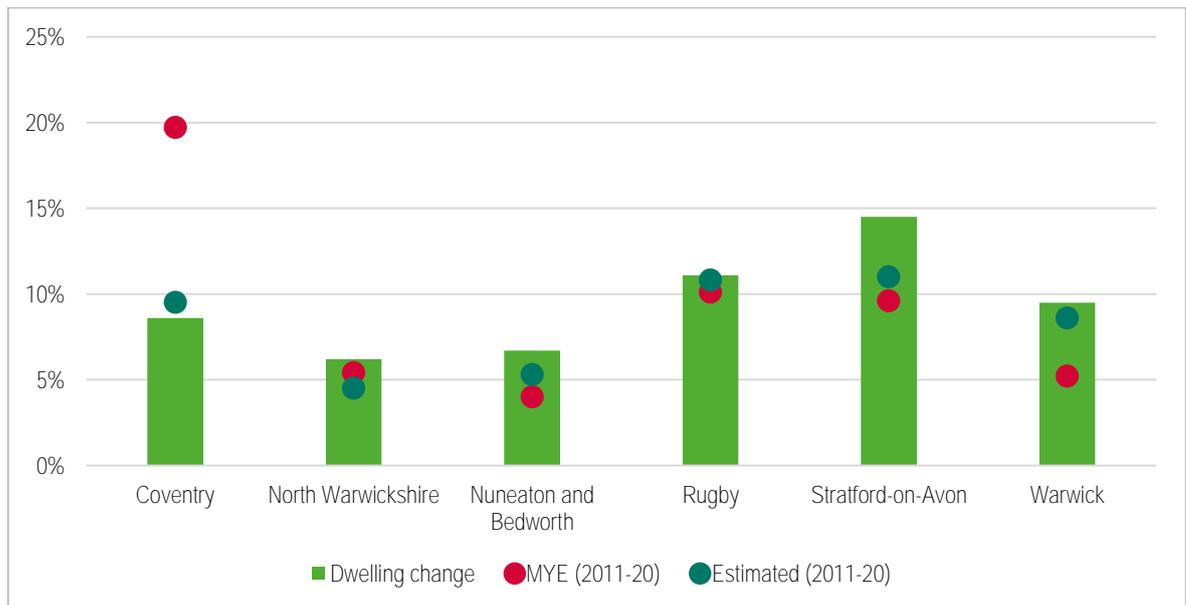
Table 5.18 Estimated percentage increase in population (2011-20) and increase in dwelling stock

	MYE (2011-20)	Estimated (2011-20)	Dwelling change
Coventry	19.7%	9.5%	8.6%
North Warwickshire	5.4%	4.5%	6.2%
Nuneaton & Bedworth	4.0%	5.3%	6.7%
Rugby	10.1%	10.8%	11.1%
Stratford-on-Avon	9.6%	11.0%	14.5%
Warwick	5.2%	8.6%	9.5%
Coventry & Warwickshire	11.5%	8.7%	9.5%

Source: JGC Estimates

5.89 The figure below shows this data. It is notable that whilst the estimated population of Coventry has been reduced substantially from the estimates in the MYE, it is still the only area where it is estimated that population growth (in percentage terms) is higher than dwelling growth. Just visually looking at this data, it is considered that the revised figures are likely to be a far more realistic view of population levels in 2020 than the MYE.

Figure 5.19: Comparing Estimated Population and Dwelling Stock Growth, 2011-20



Source: JGC Estimates based on a range of sources

Population Estimates and the 2021 Census

5.90 In the analysis above an estimate of population in 2020 was made based on a range of secondary data sources and prior to publication of the 2021 Census. Once the Census was released it was possible to compare figures from the two sources. To ensure a consistent base date (of 2021) the estimates presented above were rolled forward for a year based on estimated trends for the 2022-

20 period. Below a comparison is made with the Iceni estimates and the Census. For reference, a comparison is also provided with the latest ONS subnational population projections (SNPP).

- 5.91 The table below shows a total population from the Census of around 942,000 people, this is notably lower than had been projected by ONS in their most recent projections (some 26,000 people lower) and is also slightly lower than Iceni had estimated from a range of data sources (a difference of about 6,000 people). The data does however also show some notable age structure differences. Focussing on a comparison with Iceni, it can be seen that Iceni generally over-estimated the population of people aged 20-34 but under-estimated the 35-54 age group. Comparisons with the SNPP show the same pattern, but with some larger difference between sources (notably in the 20-29 age group).
- 5.92 It should be noted that this analysis is essentially assuming that the Census is correct and it is possible that there are issues with this data. This might particularly be due to the pandemic and potentially impact on students who may well have been recorded at a home address whereas they would normally be recorded as living in the location of their University. For the purposes of the analysis, the Census data is assumed to be broadly correct but some comments are made about the student population later in this section.

Table 5.19 Comparing population estimates and projections for 2021 – Coventry/Warwickshire HMA

	SNPP (2021)	Iceni (2021)	Census (2021)	Census difference from SNPP	Census difference from Iceni
0-4	54,100	52,100	51,400	-2,700	-700
5-9	58,300	57,400	56,000	-2,300	-1,400
10-14	57,800	57,300	56,700	-1,100	-600
15-19	55,300	55,100	57,400	2,100	2,300
20-24	73,800	70,000	63,500	-10,300	-6,500
25-29	75,500	69,500	60,400	-15,100	-9,100
30-34	70,400	68,000	65,700	-4,700	-2,300
35-39	61,200	60,000	62,300	1,100	2,300
40-44	56,200	55,200	58,400	2,200	3,200
45-49	56,900	56,400	58,900	2,000	2,500
50-54	61,700	61,300	64,500	2,800	3,200
55-59	60,400	60,400	61,900	1,500	1,500
60-64	51,800	51,800	52,100	300	300
65-69	44,200	43,900	44,500	300	600
70-74	45,100	44,900	45,300	200	400
75-79	36,700	36,600	35,600	-1,100	-1,000
80-84	24,600	24,500	24,500	-100	0
85+	24,100	23,600	23,000	-1,100	-600
TOTAL	967,900	947,900	942,100	-25,800	-5,800

Source: ONS and Iceni population modelling

5.93 The table below provides a summary of overall population estimates from the various sources for all local authorities. This generally shows Iceni estimates to be fairly close to those now shown in the Census. The main differences are in Coventry and Warwick, where Iceni estimated a higher population than the Census – these are the two areas where the recording of students might be an issue.

Table 5.20 Comparing population estimates and projections for 2021 – local authorities

	SNPP (2021)	Iceni (2021)	Census (2021)	Census difference from SNPP	Census difference from Iceni
Coventry	386,800	350,900	345,300	-41,500	-5,600
N Warwks	66,300	65,300	65,000	-1,300	-300
N & B	130,600	133,100	134,200	3,600	1,100
Rugby	109,900	112,400	114,400	4,500	2,000
SoA	130,800	135,600	134,700	3,900	-900
Warwick	143,400	150,500	148,500	5,100	-2,000
C & W	967,900	947,900	942,100	-25,800	-5,800

Source: ONS and Iceni population modelling

Students in the 2021 Census

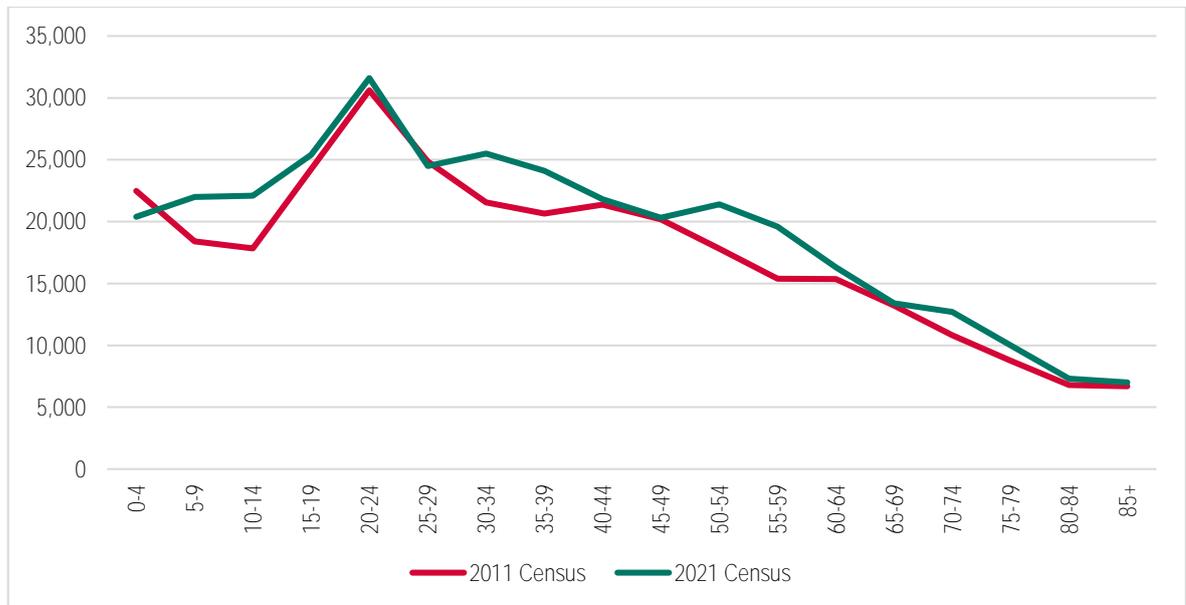
- 5.94 The analysis above showed population estimates made by IcenI prior to publication of the 2021 Census generally reflected the outcome of the Census. Two areas where IcenI showed a higher estimate (Coventry and Warwick) are also two areas with large student populations. Further analysis of the age structure in these locations (see below) reveals particular differences in the 20-24 and 25-29 age groups; groups in which a high proportion of students would be expected to be found.
- 5.95 In both areas, IcenI's estimates were higher than the Census, which led to the consideration of the possibility that some students who would normally be recorded as living in those local authorities were excluded. In considering this possibility, the timing of the Census was also a relevant factor with data having been collected during the pandemic – Census day (21st March 2021) was during a phased exit from lockdown.
- 5.96 The specific concern is that students who would normally be recorded as resident at their place of study were only recorded at their place of residence at the time (often back at family home) and this has an impact on the Census estimates. To try to study this possibility the tables and figures below show data from a range of sources. These are:
- ONS pre-Census population projection figures for 2021 (based on MYE to 2018);
 - IcenI pre-Census population estimates – based on MYE to 2020 and other sources of data such as the Patient Register; and
 - 2021 Census estimates.
- 5.97 Data on the age structure comparison has previously been included for Coventry and is not repeated below, although equivalent data is provided for Warwick. It can be seen in both key local authorities that the number of people aged 20-24 and 25-29 was much lower in the Census than previous estimates. The figures show a comparison of the age structure in each area for 2011 and 2021. For Coventry this shows a modest increase over the decade in the 20-24 age group and a modest decline for those aged 25-29. For Warwick, a decrease is seen in the 20-24 age group and a modest increase for those aged 25-29.
- 5.98 Overall, the analysis shows little change in the number of people in typical student age groups, but over a period when student numbers are recorded as having increased (particularly for Coventry University).

Table 5.21 Comparing population estimates and projections for 2021 – Warwick

	SNPP (2021)	Iceni (2021)	Census (2021)	Census difference from SNPP	Census difference from Iceni
0-4	7,300	7,900	7,400	100	-500
5-9	7,800	8,200	8,200	400	0
10-14	8,000	8,200	8,100	100	-100
15-19	7,400	7,600	9,300	1,900	1,700
20-24	12,600	14,800	10,800	-1,800	-4,000
25-29	10,500	11,300	9,500	-1,000	-1,800
30-34	9,400	10,500	10,500	1,100	0
35-39	8,300	8,700	9,900	1,600	1,200
40-44	8,800	9,200	9,500	700	300
45-49	9,000	9,200	9,500	500	300
50-54	9,500	9,700	10,000	500	300
55-59	9,300	9,500	9,700	400	200
60-64	7,800	8,000	8,000	200	0
65-69	6,800	6,900	7,100	300	200
70-74	7,100	7,200	7,200	100	0
75-79	5,800	5,800	5,700	-100	-100
80-84	3,800	3,900	4,000	200	100
85+	4,200	4,200	4,000	-200	-200
TOTAL	143,400	150,500	148,500	5,100	-2,000

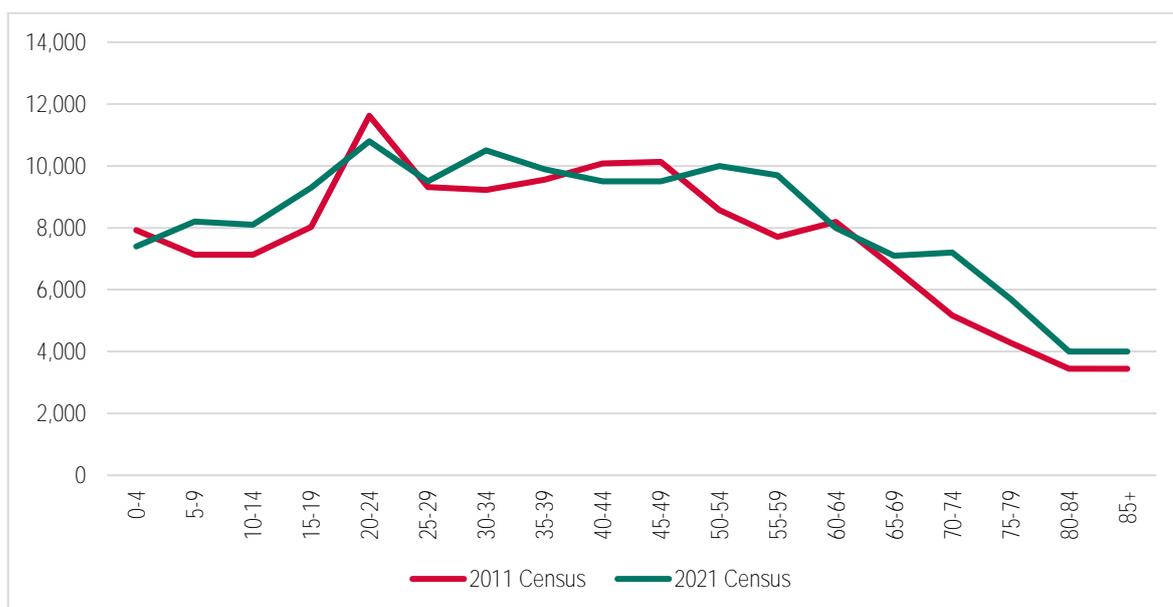
Source: ONS and Iceni population modelling

Figure 5.19: Comparing Estimated Population by age in 2011 and 2021 – Coventry



Source: ONS (Census)

Figure 5.19: Comparing Estimated Population by age in 2011 and 2021 – Warwick



Source: ONS (Census)

- 5.99 To try to understand to possibility of students having been missed by the Census, consultation was carried out with representatives of both Coventry and Warwick Universities with focus on the key question: ‘does it seem likely that some students have been missed from Census recording?’.
- 5.100 Warwick University noted there had been some contact with ONS about promoting the Census with students although this was essentially around encouragement to complete the form rather than any attempt to reflect ‘where’ it was completed. It was also commented that the 21st March was the day after term finished which could have meant some students who were in Warwick having left. It was however considered that the majority of overseas students who left during the pandemic are likely to have returned by Census day.
- 5.101 Coventry University were not aware of any discussion with ONS about student completion of the Census. They did note that due to COVID the University moved to a different model of delivery (more online) so there is a possibility that some students who would normally be expected to be resident near their place of study were not.
- 5.102 Overall, the two Universities agreed that it was ‘possible’ that some students who would normally have been resident in the area were not, and that they may have been missed out of the Census. However, there was no real way of confirming this or being able to quantify numbers.
- 5.103 For the purposes of analysis in this report, it has therefore been assumed that the Census is as accurate as it reasonably can be – and taken forward as a base position for analysis of current and future demographic trends.

Base Census Population Trends

- 5.104 Analysis at the beginning of this section compared population estimates from the Census and other sources (notably the MYE). For the record, the tables below briefly study population change from these sources back to 2011. The MYE timeseries only has data to 2020 and so annual figures are provided for this comparison. The first table below looks at Census data and the second from the MYE. For the whole HMA the analysis shows much lower population growth recorded by the Census than in the MYE (8,000 per annum compared with 11,100 in the MYE). Virtually all of this difference is due to the Census showing lower population growth in Coventry, with all other areas (apart from North Warwickshire) showing higher growth in the Census than had previously been estimated.

Table 5.22 Population Change (2011-21) shown by Census data – Coventry-Warwickshire

	2011	2021	Change	Per annum
Coventry	316,960	345,300	28,340	2,834
North Warwickshire	62,014	65,000	2,986	299
Nuneaton and Bedworth	125,252	134,200	8,948	895
Rugby	100,075	114,400	14,325	1,433
Stratford-on-Avon	120,485	134,700	14,215	1,422
Warwick	137,648	148,500	10,852	1,085
Coventry & Warwickshire	862,434	942,100	79,666	7,967

Source: 2011 and 2021 Census

Table 5.23 Population Change (2011-20) shown by mid-year population estimates – Coventry-Warwickshire

	2011	2020	Change	Per annum
Coventry	316,915	379,387	62,472	6,941
North Warwickshire	62,089	65,452	3,363	374
Nuneaton and Bedworth	125,409	130,373	4,964	552
Rugby	100,496	110,650	10,154	1,128
Stratford-on-Avon	120,824	132,402	11,578	1,286
Warwick	137,736	144,909	7,173	797
Coventry & Warwickshire	863,469	963,173	99,704	11,078

Source: ONS MYE

- 5.105 Given a clear discrepancy between previous population estimates and the Census, and the fact that MYE data is used by ONS to develop projections, the opportunity has been taken to seek to develop a trend-based projection, taking account of the 2021 Census and also more recent data around fertility and mortality. The analysis also looks at likely recent migration trends, recognising that migration is likely to have been variable over the 2011-21 period. The projection takes two stages, firstly to develop a population projection and secondly to convert this into household estimates (which can then be used to consider overall housing need).

Developing Trend-based Population Projections in Coventry and Warwickshire

- 5.106 The purpose of this section is to develop trend-based population projections for the six local authorities in Coventry and Warwickshire. As noted, a key driver of this is due to publication of new (2021) Census data which has essentially reset estimates of population (size and age structure) compared with previous mid-year population estimates (MYE) from ONS.
- 5.107 Whilst for many areas, the ONS monitoring of population through the MYE looks to be similar to results now published from the Census there are many locations (notably Coventry) where there are clear discrepancies between previous estimates and the Census.
- 5.108 The analysis seeks to provide projections rebased to 2021 (Census data) and draws on ONS MYE data up to 2020 – including data about births, deaths and migration. It should be noted that the projections are based on published data which in many cases (e.g. discrepancies between MYE and the Census) is likely to be incorrect and therefore has been used in the most realistic way possible.
- 5.109 That said, assumptions have needed to be made and it is considered that these projections are based on the best information available at the time of writing. Assumptions will need to be reviewed as appropriate following further publications of data from ONS, including a new MYE to 2021 and 2021-based subnational population projections (SNPP) – likely to be in 2023. In the next round of projections ONS will need to grapple with the same issues as raised in the analysis below, notably how to deal with past population estimates where Census data shows these to be substantially wrong.
- 5.110 A projection has been developed looking at estimated migration trends over the past 10-years. A 10-year period has been chosen as it aligns with the period between the two Census and makes adjustments based on estimates of Unattributable Population Change (UPC). The UPC is calculated over a 10-year period and in reality it is not known in which years it has arisen – therefore using a different trend period could over- or under-estimate population change and migration – and is therefore difficult to robustly achieve.
- 5.111 The use of 10-years also covers a full housing market cycle, which in the case of Coventry and Warwickshire will mean understanding data from both before and after the adoption of latest local plans²⁰ and periods of stronger and weaker housing market conditions. Using longer trend periods was also something recommended by the Planning Advisory Service (PAS) prior to the introduction of the Standard Method. In the PAS technical advice note of July 2015 it is stated *'In assessing housing need it is generally advisable to test alternative scenarios based on a longer reference*

²⁰ Housing delivery can often peak in the years following the adoption of new local plans

period... Other things being equal, a 10-to-15 year base period should provide more stable and more robust projections than the ONS's five years'.

5.112 Below we set out the general method used for each of the components and the outputs from a trend based projection. The example used is for Coventry (where the Census showed far lower growth between 2011 and 2021 than had previously been estimated by MYE) but can equally be applied for other areas, including those where population growth is shown to have been higher than previous estimates. The latest ONS projections are a 2018-based set of SNPP and whilst these are not directly used in the analysis, reference is made to allow comparisons between the ONS position (which was pre-Census) and projections developed below.

Fertility

5.113 For fertility it is the case that overestimating population will mean that fertility rates in the SNPP are too low (as ONS is essentially assuming a number of births to more people). To make an adjustment, the number of births for 2021/22 in the SNPP is used and then an estimate made of how many births the ONS rates would imply if the population age structure for 2021 is replaced as the base against which births are calculated. In the case of Coventry, the lower population in the Census would imply a much lower level of births than if the rates in the SNPP are used and so birth rates have been increased significantly (initially by around 25%).

- 2021/22 births SNPP – 4,852
- 2021/22 births updated population – 3,881
- Rate as % of SNPP – 125% (4,852/3,881)

5.114 The birth *rate* increases as births had been broadly properly recorded but the population had been over-estimated.

5.115 There is however some more recent data about births from the 2020 MYE which can be used to moderate this figure (noting that the SNPP on draws on data to 2018). In this case the actual number of births recorded is slightly lower than was projected in the SNPP so a small downward adjustment is made to the fertility rate.

- MYE births (2018-20) – 8,384
- SNPP birth (2018-20) – 9,326
- Adjustment – 90% (8,384/9,326)

5.116 The two adjustments are then multiplied to give a change to base fertility rates, this is around 112% (125% * 90%).

5.117 The table below shows the adjustments applied for all local authorities in the HMA. It can be seen for all areas apart from Coventry that these are in a downward direction, reflecting the general trend (including up to 2020) for birth rates to be falling as well as adjustments made for Census population estimates.

Table 5.24 Adjustments made to modelled fertility rates from 2018-based position

	Adjustments to SNPP fertility rates
Coventry	112%
North Warwickshire	94%
Nuneaton & Bedworth	97%
Rugby	89%
Stratford-on-Avon	95%
Warwick	89%

Source: Derived from ONS data

Mortality

5.118 The same issue arises with mortality, in that deaths recorded by MYE are applied to a different population than is now shown. Generally for mortality any adjustments are more minor than for fertility, this is because most deaths occur in older age, and generally the MYE is fairly good at estimating the size of the older person population (in part due to them being less likely to be migrants). In Coventry, the adjustment is in a downward direction, although only a 1% change from the SNPP position.

- 2021/22 deaths SNPP – 2,789
- 2021/22 deaths updated population – 2,769
- Rate as % of SNPP – 101% (2,789/2,769)

5.119 A similar adjustment to fertility is made to take account of death data to 2020 as shown below, when this data is taken into account the modelled adjustment sees rates being increased by about 9% from the SNPP position.

- MYE deaths (2018-20) – 5,920
- SNPP deaths (2018-20) – 5,441
- Adjustment – 109% (5,920/5,441)

5.120 Again, the two adjustments are multiplied to give a change to base mortality rates, this is around 110% (101% * 109%).

- 5.121 The table below shows the mortality adjustments applied for all local authorities in the County. It can be seen that all are in an upward direction, reflecting the general trend (including up to 2020) for death rates to not be increasing at the rate previously projected (as well as adjustments made for Census population estimates).

Table 5.25 Adjustments made to modelled mortality rates from 2018-based position

	Adjustments to SNPP mortality rates
Coventry	110%
North Warwickshire	110%
Nuneaton & Bedworth	109%
Rugby	106%
Stratford-on-Avon	105%
Warwick	103%

Source: Derived from ONS data

Migration

- 5.122 When looking at migration our starting point is to consider how different migration has been over the 2011-21 period than was previously estimated by ONS. Essentially the difference in population growth between the two sources is likely to be attributable to migration, this is on the basis that it is expected that births and deaths have been fairly well recorded by ONS.
- 5.123 Analysis is slightly complicated by MYE data only being available to 2020 but the Census having a clear data point of 2021 (but not 2020). To try to provide as consistent a comparison as possible the MYE to 2020 has been used and the incremental change in the SNPP for 2020-21 added on to get to a 2021 estimate. Whilst this will be an estimate, the inclusion of just 1-year of data from the SNPP is unlikely to have any significant impact on the findings.
- 5.124 Again focussing on Coventry, the figures below shows the MYE and SNPP expected/projected population to have increased by 68,364 people in the 2011-21 period, whereas the Census now shows a change of 28,340 – this is a difference of 40,024. This would imply net migration has on average been about 4,000 people lower per annum over the decade to 2021 (40,024/10).

Table 5.26 Coventry – MYE and Census population estimates

	MYE/SNPP	Census
2011	316,915	316,960
2021	385,279	345,300
Change	68,364	28,340

Source: Derived from ONS data

5.125 For information, the table below shows the same figures for all authorities in the HMA, this clearly shows in most areas (Coventry and North Warwickshire excepted) that population figures shown by the Census are above previous estimates/projections. It will also be noted from the table that the two 2011 figures are slightly different, this is due to one being a mid-year figure and the other dated as of the Census (which was March). To provide a mid-year figure for 2021 based on the Census, an adjustment has been made based on adjustments seen in 2011.

Table 5.27 MYE and Census population estimates – Coventry-Warwickshire authorities

		2011	2021	Change
Coventry	MYE/SNPP	316,915	385,279	68,364
	Census	316,960	345,300	28,340
North Warwickshire	MYE/SNPP	62,089	65,919	3,830
	Census	62,014	65,000	2,986
Nuneaton & Bedworth	MYE/SNPP	125,409	130,973	5,564
	Census	125,252	134,200	8,948
Rugby	MYE/SNPP	100,496	111,552	11,056
	Census	100,075	114,400	14,325
Stratford-on-Avon	MYE/SNPP	120,824	133,481	12,657
	Census	120,485	134,700	14,215
Warwick	MYE/SNPP	137,736	145,268	7,532
	Census	137,648	148,500	10,852
Coventry-Warwickshire	MYE/SNPP	863,469	972,472	109,003
	Census	862,434	942,100	79,666

Source: Derived from ONS data

5.126 It is not known if this difference in population growth (attributed to migration) is due to an under-estimate of in-migration or an over-estimate of out-migration and in reality it is likely to be a combination of the two. For the purposes of modelling it has been assumed that the difference is split equally between these two components, for Coventry this would mean that in-migration was on average around 2,001 people per annum lower in the 2011-21 period and out-migration 2,001 people higher.

5.127 Analysis also seeks to determine a baseline starting position for both in- and out-migration and to do this data from MYE up to 2020 has been used (so covering a 10-year period 2010-20). The table below shows the average in- and out-migration over this period in Coventry and the adjustment made to take account of the difference previously shown between population estimates and the Census. Over the 2010-20 period ONS estimated an average net migration of 5,200 people each year, but the Census suggests this was around 4,000 lower and so the base position is net migration of about 1,200. In modelling in- and out-migration figures are treated separately but it is typically earlier to compare data when looking at net figures.

Table 5.28 Base estimate of migration – Coventry

	Average (2010-20)	Adjustment	Base position
In-migration	27,707	-2,001	25,705
Out-migration	22,507	2,001	24,508
Net migration	5,200	-4,002	1,197

Source: Derived from ONS data

5.128 Across the whole of the HMA, the start point net migration is estimated to be around 5,500 people per annum. Upward adjustments are made in all areas apart from Coventry and North Warwickshire, however the adjustment made for Coventry is such that overall the start point for net migration is notably below the level recorded by ONS for this period.

Table 5.29 Base estimate of migration – Coventry-Warwickshire

		In-migration	Out-migration	Net migration
Coventry	Average (2010-20)	27,707	22,507	5,200
	Adjustment	-2,001	2,001	-4,002
	Base position	25,705	24,508	1,197
North Warwickshire	Average (2010-20)	3,585	3,200	385
	Adjustment	-42	42	-84
	Base position	3,543	3,242	301
Nuneaton & Bedworth	Average (2010-20)	5,492	5,282	209
	Adjustment	169	-169	338
	Base position	5,661	5,113	548
Rugby	Average (2010-20)	5,785	4,960	825
	Adjustment	163	-163	327
	Base position	5,949	4,797	1,152
Stratford-on-Avon	Average (2010-20)	7,791	6,339	1,452
	Adjustment	78	-78	156
	Base position	7,869	6,261	1,607
Warwick	Average (2010-20)	10,175	9,850	324
	Adjustment	166	-166	332
	Base position	10,341	9,684	656
Coventry-Warwickshire	Average (2010-20)	-	-	8,395
	Adjustment	-	-	-2,934
	Base position	-	-	5,461

Source: Derived from ONS data

5.129 It is however not a simple process to just apply these uplifts for each year of the projection as migration can vary over time and each of in- and out-migration need to be considered separately.

In-Migration

- 5.130 Levels of in-migration will to some extent vary depending on the size of the population from which migrants will be drawn. If for example typically 10% of people in Area A move to Area B in any given year then the size of the population in Area A will impact on the actual numbers moving. If in year 1 there are 10,000 people in Area A then 1,000 would be expected to move to Area B, but if in year 2 the population is only 9,000 there would only be 900 movers.
- 5.131 The age structure will also have an influence on the number of moves as typically older people are less likely to be migrant and so an ageing population might see in-migration reduce over time, although an increasing population generally might be expected to see migration increase.
- 5.132 For the purposes of modelling we have considered the relationship between the national population and the projected number of in-migrants. The latest national projection is a 2020-based ONS publication.
- 5.133 Over time, population growth rates nationally are projected to fall (remaining positive but at a reducing rate) and this is in part (in early years) due to reducing levels of in-migration – although reductions in natural change have the greatest impact over the longer term. Overall, it is considered with an increasing population that levels of in-migration will increase over time but at a reducing rate. For the purposes of modelling it has been assumed that future in-migration will broadly track the midpoint between rates remaining in-line with national population change and the rates estimated for the 10-year period to 2020.
- 5.134 Whilst this is an assumption, it is considered to be broadly reasonable given the general direction of demographics both locally and nationally.

Out-migration

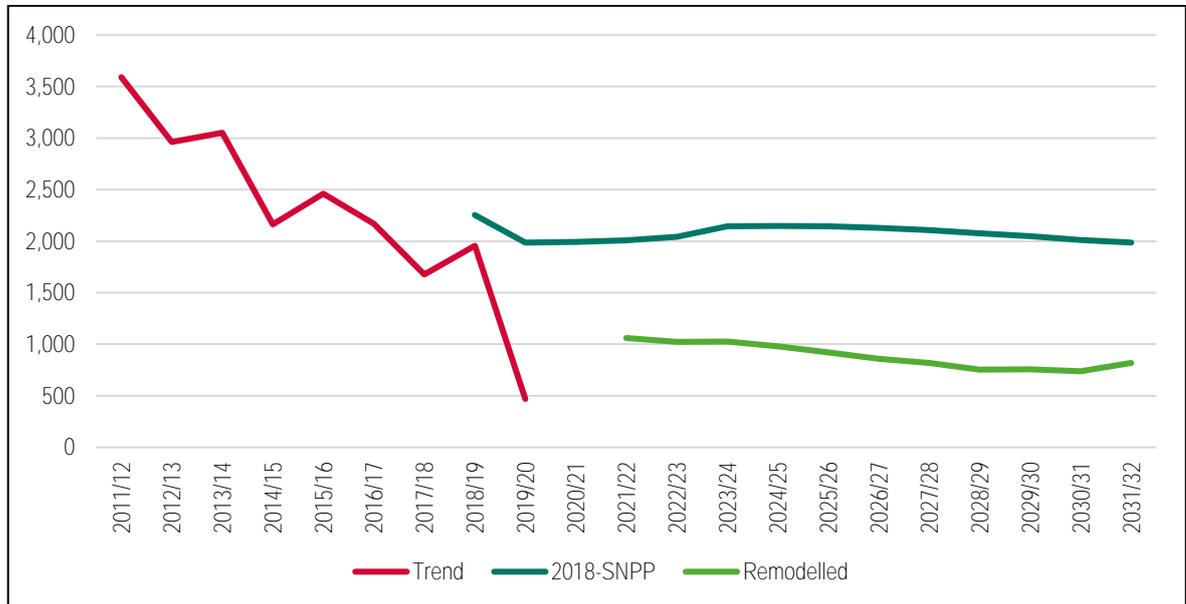
- 5.135 For out-migration, levels will vary depending on the size of the population in the area being studied. For example, if the population of Coventry grows at a faster rate than other locations then there is a larger pool of people from which out-migrants might be drawn. With a growing population, out-migration would therefore be expected to increase over time.
- 5.136 However, it is also noted that at a national level, out-migration in the early years of the projection is projected to fall, whilst a changing age structure (increasing older person population) will to some extent moderate any changes, as older people are less likely to be migrant.
- 5.137 Therefore a consistent method to that used for in-migration has been applied for out-migration, that is the estimated level of out-migration is set at the midpoint between estimated past levels of out-migration and the level that would be expected if the ratio between population growth and out-

migration were maintained. As before, this is an assumption, but is likely to be reasonable given the range of data available.

HMA-wide Projection Outputs

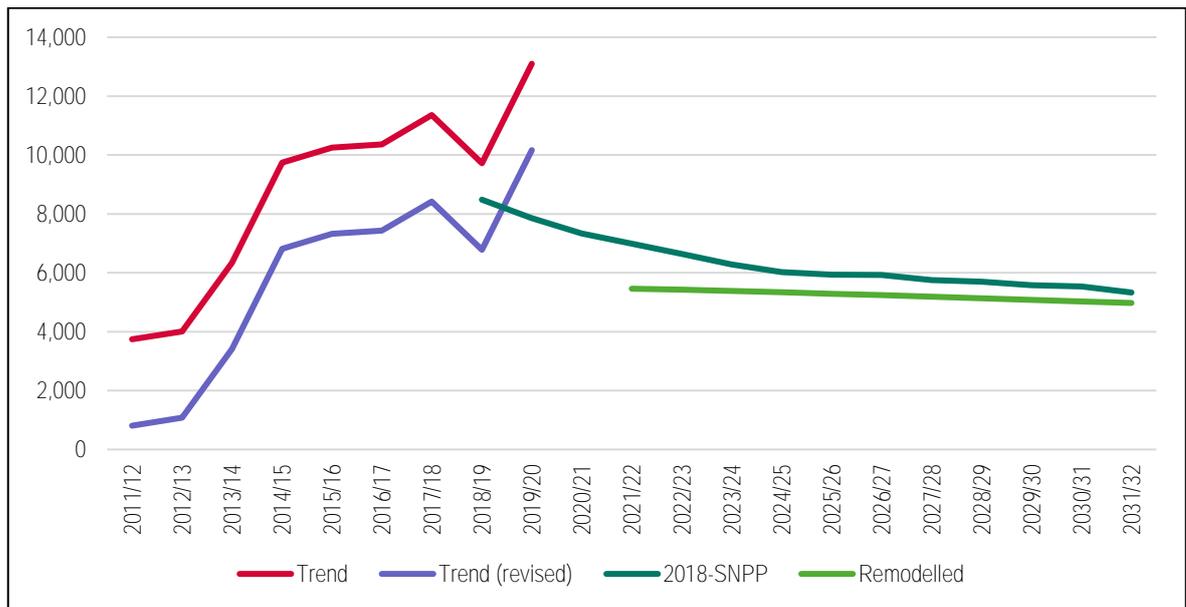
5.138 The above estimates of fertility, mortality and migration (including changes over time) have been modelled to develop a projection for the period to 2032 – this data being chosen as it is possible to develop an equivalent estimate of housing need using the framework of the Standard Method. Below are a series of charts showing key components of change and overall population change. Further tables provide summary information for each local authority. For contrast, data is compared with that from the 2018-based SNPP, that being the most recent projection released by ONS.

Figure 5.1: Past trends and projected natural change – Coventry-Warwickshire



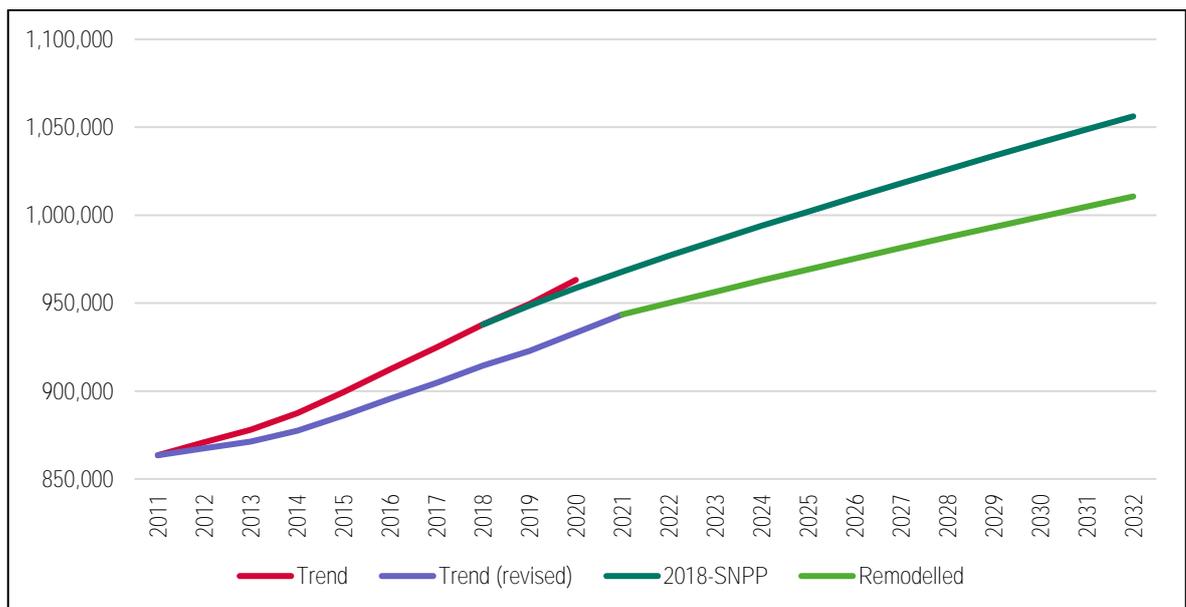
Source: ONS and demographic projections

Figure 5.2: Past trends and projected net migration – Coventry-Warwickshire



Source: ONS and demographic projections

Figure 5.3: Past trends and projected population – Coventry-Warwickshire



Source: ONS and demographic projections

5.139 The tables below show estimated population growth across the HMA split into 3 broad age bands (which can generally be described as a) children, b) working-age and c) pensionable age). This analysis shows population being projected to increase by around 60,600 people – this is a 6.4% increase over the 10-year period. The population aged 65 and over is projected to see the highest proportionate increase, but in actual number terms the population aged 16-64 is projected to see a similar level of growth. The increases in in population can be compared with the change shown by the Census (for 2011-21) of 9.2%.

Table 5.30 Projected change in population by broad age group (2022-32) – Coventry-Warwickshire

	2022	2032	Change	% change
Under 16	175,809	172,276	-3,534	-2.0%
16-64	597,484	629,204	31,720	5.3%
65+	176,736	209,181	32,446	18.4%
TOTAL	950,029	1,010,661	60,632	6.4%

Source: Demographic projections

Household Projections

5.140 The final part of the projection is to convert population estimates into households by discounting the communal population (to give a household population) and then applying household representative rates (HRR). The first analysis is however to estimate the number of households in the HMA (and authorities) as of 2021. The table below shows household estimates from the Census and also dwelling counts from DLUHC live tables.

5.141 It can be seen in all areas that the number of completions exceeds the growth in households (notably in Coventry and to a lesser extent Warwick). It is unclear why the Census figures are so low and arguably they look slightly unrealistic in some cases. Modelling has therefore been undertaken to provide estimated households in 2021 based on looking at the relationship between households and dwellings in 2011 and applying a similar relationship to 2021 dwellings. In do this, a base number of households in 2021 is as shown below:

- Coventry – 140,117
- North Warwickshire – 27,602
- Nuneaton & Bedworth – 56,943
- Rugby – 47,565
- Stratford-on-Avon – 60,426
- Warwick – 65,012

Table 5.31 Change in the number of households and dwellings (2011-21) – Coventry-Warwickshire

		2011	2021	Change
Coventry	Households	128,592	134,100	5,508
	Dwellings	132,891	144,939	12,048
North Warwickshire	Households	25,812	27,600	1,788
	Dwellings	27,033	28,858	1,825
Nuneaton & Bedworth	Households	52,711	56,600	3,889
	Dwellings	54,167	58,417	4,250
Rugby	Households	41,875	47,000	5,125
	Dwellings	43,192	48,816	5,624
Stratford-on-Avon	Households	51,928	59,500	7,572
	Dwellings	54,781	63,548	8,767
Warwick	Households	58,679	62,600	3,921
	Dwellings	60,427	66,909	6,482
Coventry-Warwickshire	Households	359,597	387,400	27,803
	Dwellings	372,491	411,487	38,996

Source: ONS (Census) and DLUHC (Table 125)

- 5.142 In projecting forward, data about household representative rates (HRRs) has been drawn from the 2014-based subnational household projections (SNHP). HRRs can be described in their most simple terms as the number of people who are counted as heads of households (or in this case the more widely used Household Reference Person (HRP)). The 2014-based figures are used as these underpin the Standard Method and generally have attracted less criticism in terms of building in a suppression of household formation than more recent projections.
- 5.143 Recent SNHP (since the 2014-based release) have come under some criticism. This is largely as they are based on data in the 2001-11 Census period and project forwards trends in household formation in this period – one in which housing affordability deteriorated significant. In both Coventry and Warwickshire, this suppression is particularly evident for the 25-34 age group where there was a notable drop in formation rates from 2001 to 2011, and ONS are projecting some continuation of this moving forward to 2021, after which the (lower) rate is held broadly stable.
- 5.144 Data about the communal population has also been drawn from the 2014-SNHP. For all areas, the 2014-HRRs have been adjusted to match the estimated number of households shown above with future (projected) years using the same incremental changes as in the base source.
- 5.145 The analysis projects an increase of around 3,500 households per annum over the 2022-32 period, with figures ranging from 94 in North Warwickshire, up to 1,296 in Coventry.

Table 5.32 Projected change in households – remodelled projection

	Households 2022	Households 2032	Change in households	Per annum
Coventry	141,244	154,202	12,958	1,296
North Warwickshire	27,709	28,653	944	94
Nuneaton & Bedworth	57,302	60,618	3,316	332
Rugby	48,232	54,269	6,037	604
Stratford-on-Avon	61,131	67,271	6,140	614
Warwick	65,503	71,215	5,712	571
Coventry-Warwickshire	401,120	436,228	35,108	3,511

Source: Demographic projections

Standard Method (with revised Household Projections)

- 5.146 The analysis below calculates housing need using the Standard Method, but replacing the 2014-based SNHP with the alternative projections shown above.
- 5.147 With the remodelled projection, the need is slightly lower than the analysis using 2014-based projections, with a need shown for around 4,900 dwellings per annum. The projections show a lower need in Coventry, but also North Warwickshire and Nuneaton & Bedworth, relative to standard method using the 2014-based Household Projections.

Table 5.33 Standard Method Housing Need Calculations using revised demographic projections

	Coventry	North Warwks	Nuneaton & Bedworth	Rugby	Stratford- on-Avon	Warwick	C & W
Households 2022	141,244	27,709	57,302	48,232	61,131	65,503	401,120
Households 2032	154,202	28,653	60,618	54,269	67,271	71,215	436,228
Change in households	12,958	944	3,316	6,037	6,140	5,712	35,108
Per annum change	1,296	94	332	604	614	571	3,511
Affordability ratio (2021)	5.96	8.23	7.73	7.47	10.62	10.73	
Uplift to household growth	12%	26%	23%	22%	41%	42%	
Initial need (per annum)	1,455	119	409	735	868	811	4,397
Capped	1,455	119	409	735	868	811	4,397
Urban uplift	35%	0%	0%	0%	0%	0%	
Total need (per annum)	1,964	119	409	735	868	811	4,906

Source: Derived from a range of ONS and MHCLG sources

- 5.148 Because of the demographic interactions between authorities across the Housing Market Area, there is a strong case for using a consistent approach and consistent set of demographic data across the HMA.

Use of Trend-based Projection in this Report

- 5.149 Some analysis later in this report looks at the implications of demographic change (e.g. when projecting changes to the number of people with disabilities) and this draws on the remodelled trend-based projection. Where the analysis is related to population data is taken directly from the projection, but for households a further adjustment has been made to deal with any suppression of household formation within the projections.
- 5.150 To do this a 'part-return-to-trend' analysis has been developed, where the rate of household formation sits somewhere between figures in the 2014-based projections and those in an older 2008-based version. This approach has been widely used in analysis of this nature and was an approach previously suggested by the Local Plans Expert Group (LPEG).
- 5.151 The table below shows estimated households growth using a part-return to trend (PRT) approach. Across the whole of the HMA, this shows growth of around 3,800 households per annum compared with 3,500 in the base projection.
- 5.152 It will also be noted that the estimated number of households in 2022 differs very slightly (401,120 vs. 401,332) – this is due to the inclusion of the part-return-to-trend HRRs, with improvements to household formation of younger households being modelled to start in 2021 and therefore having a small impact on data for 2022.

Table 5.34 Projected change in households with part-return-to-trend HRRs – remodelled projection

	Households 2022	Households 2032	Change in households	Per annum
Coventry	141,302	154,984	13,683	1,368
North Warwickshire	27,730	28,962	1,232	123
Nuneaton & Bedworth	57,334	61,026	3,693	369
Rugby	48,273	54,889	6,616	662
Stratford-on-Avon	61,153	67,667	6,514	651
Warwick	65,541	71,794	6,253	625
Warwickshire	260,031	284,338	24,307	2,431
Coventry-Warwickshire	401,332	439,322	37,990	3,799

Source: Demographic projections

Summary

- 5.153 The NPPF mandates the use of the 2014 subnational household projections (SNHP) in the Standard Method and following the relevant Planning Practice Guidance (PPG) the method shows a need for 5,554 dwellings per annum across the Housing Market Area (HMA).
- 5.154 The PPG does however allow for authorities to diverge from the Standard Method where this can be justified by exceptional circumstances; any alternative approach should reflect current and future demographic trends (which includes migration) and market signals.
- 5.155 For Coventry and Warwickshire there is a clear case to support exceptional circumstances (particularly in Coventry). It is clear that population growth in the City has been systematically over-estimated by ONS (dating back to at least 2001) and that the over-estimation works through into population projections that are demonstrably too high and unrealistic. The population projections will then work through into household projections and ultimately to estimates of need in the Standard Method.
- 5.156 A recognition of problems with population data for Coventry is not unique to this report. In 2020 the UK Statistics Authority recognised concerns regarding historical population estimates and projections for Coventry, and that in turn this can impact on household projections and estimates of housing need. It recommended that ONS should be more open to considering local data and feedback on its data; and ONS has since recognised this and that in turn this can impact on household projections and estimates of housing need.
- 5.157 Prior to publication of 2021 Census data, Icenic carried out a detailed review of a range of data sources which can provide an indication of population levels and growth. This very clearly confirmed a significant over-estimate of population in Coventry within ONS mid-year population estimates (MYE). Subsequently published Census data confirmed this where it is estimated that ONS had previously estimated the population of the City to be around 40,000 people higher than the Census now shows.
- 5.158 Across Warwickshire, a similar analysis suggests ONS had previously under-estimated population growth, however, the scale of the difference (around 10,700 people over the 2011-21 decade) is substantially lower than the over-estimation for Coventry.
- 5.159 It is clear from the analysis that there are exceptional circumstances which will allow a departure from the Standard Method housing need. In short, the data feeding into population (and hence household) projections is substantially wrong and will provide trend-based projections that are wholly unrealistic. As noted, issues with data for Coventry go back at least to 2001 and will therefore be impacting on all ONS projections, including those used for the 2014-based SNHP.

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- 5.160 When demonstrating exceptional circumstances, it is necessary to take forward a method that takes account of demographic trends and this report has drawn on data from the 2021 Census and information about births and deaths to develop an up-to-date trend based projection. This projection has then been used within the framework of the Standard Method (i.e. to include a relevant affordability adjustment) and shows a need across the HMA for 4,906 dwellings per annum; lower than the standard Method as published, and lower mainly due to the issues in published projections for Coventry.
- 5.161 Given across the HMA that population figures have been over-estimated for many years, it is reasonable and expected that any alternative trend-based projection would show a lower need. It is however recommended that the Councils monitor new data releases from ONS (including MYE and projections) as ONS will need to grapple with the issue of inaccuracies in the MYE in any future releases.

6. ECONOMIC GROWTH POTENTIAL

6.1 This section presents economic forecasts developed by Cambridge Econometrics (CE) for the Coventry and Warwickshire economy. We then move on to consider the future growth potential of different local economies having regard to the baseline forecasts. In doing so we have focused on potential demand-side drivers (rather than land supply).

CE's Baseline Projections – Overview

6.2 The local area baseline projections are developed based on CE's March 2021 UK and regional forecast. The projections include historical local area employment data to 2019, regional and national employment data to 2020, and GVA data to 2018.

UK Forecast

6.3 CE's UK forecast is developed using CE's Multi-Sectoral Dynamic Model (MDM). The model determines final expenditure, output and employment by disaggregating sectors, commodities, and household and government expenditures, as well as foreign trade and investment, within an input-output framework to identify the inter-relationships between sectors. The forecasts are based on the latest available national and regional historical data and macroeconomic assumptions (e.g. components of output). The key COVID-19 and EU exit assumptions are summarised below.

Covid-19

6.4 It is assumed that lockdown and social distancing measures will follow the Government's envisaged 'road map', with lockdown formally ending in late-March 2021, social distancing to progressively ease over spring and the domestic economy to open fully by mid/late summer (with all UK adults expected to be offered a dose of the COVID vaccine by this time). The assumed 'post-lockdown' pick-up in activity will mean that GDP is assumed to increase in 2021, though to a lesser extent than previously forecast due to the weak start to the year.

6.5 Despite the opening up of the UK economy in 2021 Q2, persistent economic scarring and a muted economic recovery in 2021/2022 is expected. This comes as a result of rising unemployment, business closures, weak capital accumulation and permanent productivity impacts of the pandemic.

6.6 Moreover, UK trade prospects remain very weak due to slow global economic growth (exacerbated/perpetuated by inequalities in the global allocation of the vaccine) and Brexit trade disruptions (see EU exit section below). Given this, the central assumption of the forecast is a 3.6% increase in GDP in 2021 and a 2.8% increase in GDP in 2022.

EU Exit

6.7 Based on the general terms included in the EU–UK Trade and Cooperation Agreement that was signed on 30th December 2020, the following political assumptions were adopted:

- The agreed Free Trade Agreement with the EU avoids reversal to WTO terms, but results in some barriers to trade which will gradually phase in.
- The points-based migration system introduces restrictions on inward migration from the EU.
- The uncertainty about the possibility of no-deal Brexit is lifted. However, some uncertainty remains over the speed of regulatory divergence.
- Some uncertainty remains over the possibility of changes to the agreement in the future that could affect the barriers to trade, such as the equivalence rules in the financial sector.
- The UK will continue to seek other trade agreements, which could reduce barriers to trade with non-EU countries in the future.

Local area Baseline Projections

6.8 The local area baseline projections are based on historical growth in the local area (i.e. the relevant local authority) relative to the region (West Midlands) or UK (depending on which area it has the strongest relationship with), on a sector-by-sector basis. They assume that those relationships continue into the future. Thus, if a sector in the local area outperformed the sector in the region (or UK) as a whole in the past, then it will be assumed to do so in the future. Similarly, if it underperformed the region (or UK) in the past then it will be assumed to underperform the region (or UK) in the future.

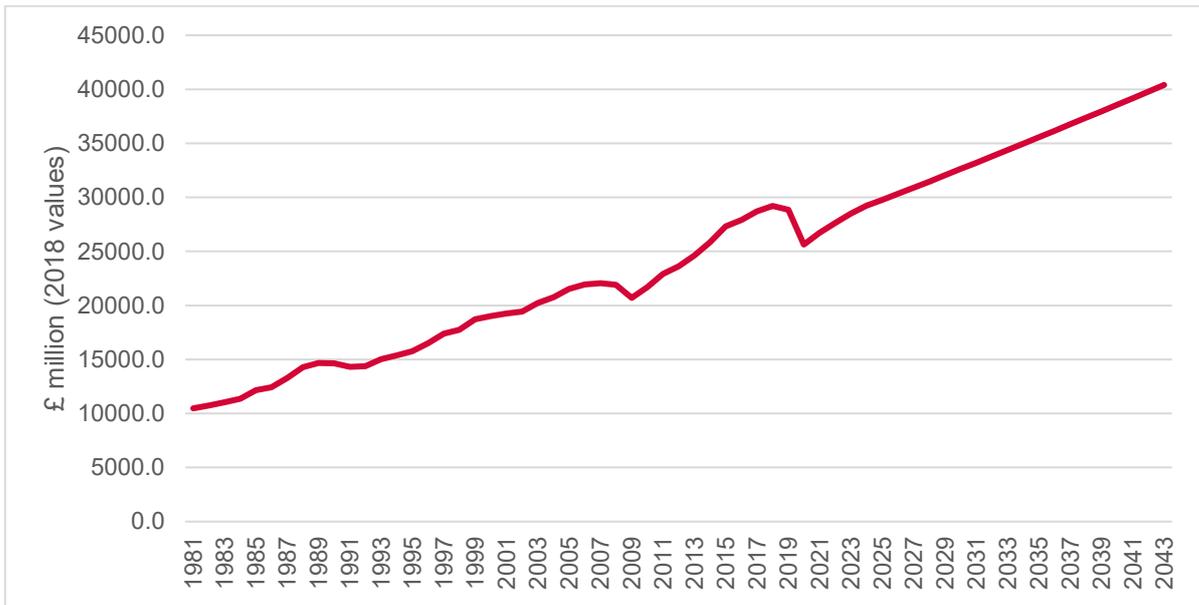
6.9 They further assume that economic growth in the local area is not constrained by supply-side factors, such as population and the supply of labour. They assume that there will be enough labour (either locally or through commuting) with the right skills to fill the jobs. If, for example, in reality, the labour supply is not there to meet projected growth in employment, growth could be slower.

6.10 The measure of employment is workplace-based jobs, which include full-time, part-time and self-employed.

Sectoral Outlook

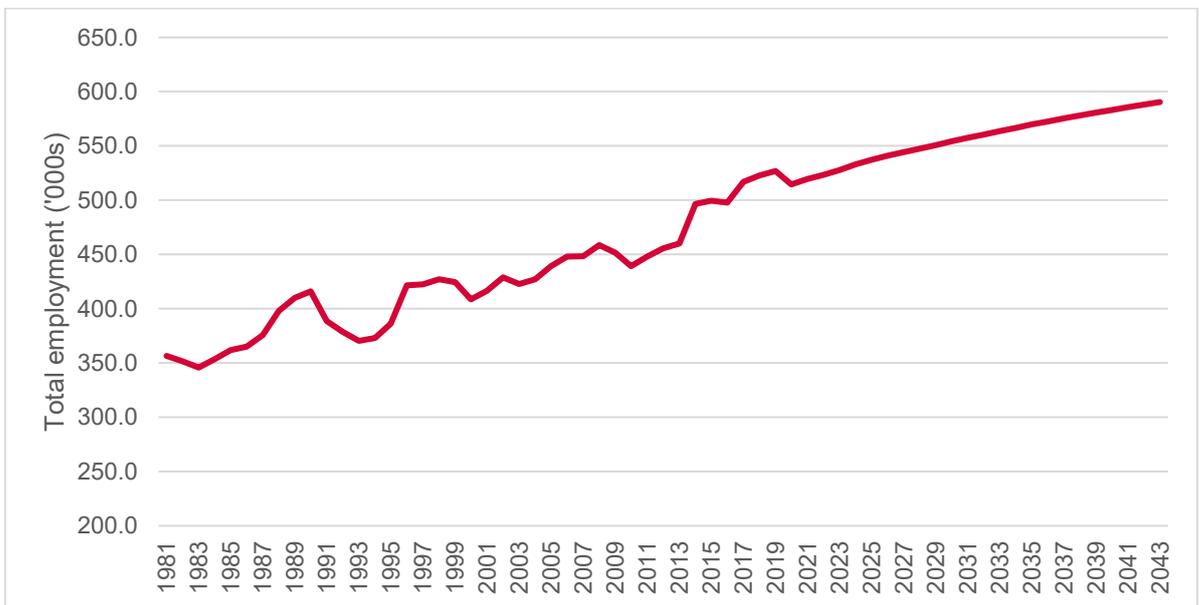
6.11 The Cambridge Econometrics forecasts expect GVA across Coventry and Warwickshire to grow by an average of 1.4% pa over the 2019-43 period. If the effect of the 2020 correction is set aside, the rate of growth would be equivalent to 2.0% pa (2020-43). This is slightly below longer-term trends.

Figure 6.1: Projected GVA – Coventry & Warwickshire



6.12 Total employment has been growing historically at a rate of 1.0% pa over the period since 1981. Employment growth looking forwards is projected to grow at 0.5% pa (2019-43) with total employment growth of 11.5 million over the period to 2043. More modest growth than historically is consistent with CE's national/ regional outlooks.

Figure 6.2: Projected Employment – Coventry & Warwickshire



6.13 The table below analyses how GVA is expected to change over the 2019-43 period. Manufacturing accounts for 20% of GVA in 2019 and is expected to retain this share, with the projections expecting growth of 1.4% pa. The picture for wholesale and warehousing is similar. The relative share of GVA

in ICT and Media; and Public Admin, Health and Education is expected to grow; whilst the share in Agriculture/Mining and Real Estate and Professional Services is expected to contract.

Table 6.1 Baseline Projections for GVA – Coventry and Warwickshire, 2019-43

	2019 GVA ('mill)	% GVA, 2019	2001-19 CAGR	2019-43 CAGR	% GVA, 2043
Agriculture, Mining & Utilities	2516.2	9.5%	5.9%	0.3%	7.4%
Manufacturing	5243.7	19.8%	2.1%	1.4%	20.1%
Construction	1622.8	6.1%	1.1%	1.1%	5.8%
Wholesale, Transport & Warehousing	3087.0	11.6%	2.0%	1.4%	11.8%
Retail, incl Motor Vehicle Trade	1977.8	7.5%	2.2%	1.3%	7.4%
Accommodation, Food & Beverage	650.4	2.5%	0.5%	2.0%	2.9%
ICT and Media	1376.9	5.2%	3.5%	2.4%	6.7%
Real Estate & Prof Services	4776.8	18.0%	2.4%	1.0%	16.6%
Public Admin, Education & Health	3890.2	14.7%	1.4%	1.8%	16.5%
Other Services	1389.5	5.2%	0.7%	1.1%	4.9%

Source: Icen analysis of CE Projections

6.14 The outlook in respect of employment is set out below.

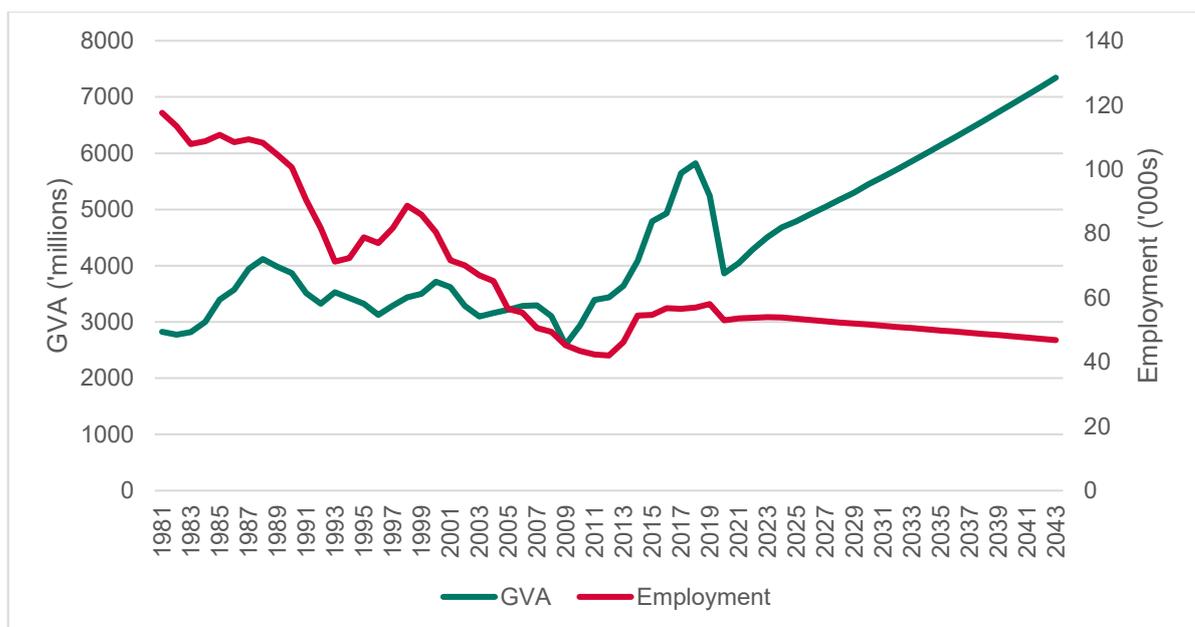
Table 6.2 Baseline Projections for Employment – Coventry and Warwickshire, 2019-43

	2019 Employ- ment ('000s)	% Employ- ment, 2019	2001-19	2011-19	2019-43	% Change, 2019-43
Agriculture, Mining & Utilities	16.3	3.1%	7.5	5.3	-2.0	-12%
Manufacturing	58.0	11.0%	-13.6	15.7	-11.2	-19%
Construction	31.7	6.0%	5.5	5.0	0.1	0%
Wholesale, Transport & Wh	61.7	11.7%	20.4	15.7	8.8	14%
Retail, incl MV Trade	54.9	10.4%	5.9	6.0	1.9	3%
Accommodation, Food & Beverage	32.6	6.2%	4.5	4.0	18.4	57%
ICT and Media	16.0	3.0%	3.7	0.0	11.5	72%
Real Estate & Prof Services	108.2	20.5%	38.6	20.3	14.5	13%
Public Admin, Education & Health	94.6	18.0%	22.0	2.4	17.0	18%
Other Services	52.7	10.0%	15.9	4.3	4.4	8%
Total	526.9	100%	110.4	78.7	63.5	12%

Source: Icen analysis of CE Projections

- 6.15 For agriculture, mining and utilities, modest growth in GVA is expected; but driven by productivity improvements, employment is expected to fall by around 12% over the period to 2043. Within this, agricultural employment is projected to remain relatively stable.
- 6.16 In the manufacturing sector, GVA is projected to grow by an average of 1.4% pa. Whilst the recent trend in employment in the sector has been upwards, improvements in productivity and increasing mechanisation mean overall employment is expected to fall. Continuing growth in the sector is however likely to mean a need for additional land. As the chart below shows, the long-term trend has been of falling manufacturing employment. Employment has stabilised in recent years (with overall employment growing slightly 2012-19) but improvements in productivity are projected to lead to a modest reduction in job numbers moving forwards. Growth in GVA has been strong over the period since 2009, and whilst some projection is expected, the longer-term outlook for manufacturing GVA growth is strong.

Figure 6.3: Trend and Projections for Manufacturing GVA and Employment – C&W



- 6.17 If we look at individual manufacturing sectors, sectors which contribute strongly to sub-regional GVA are: motor vehicles (a particular strength); other transport equipment; machinery; and metals/ metal products. Manufacturing GVA growth is expected to be driven by the automotive sector in particular with growth focused in motor vehicles, other transport equipment and machinery. However there are some other sectors where notable growth is envisaged including electronics and electrical equipment.

- 6.18 The projections expect employment/GVA contraction initially linked to the shock effects of Brexit and Covid. Modest employment growth is anticipated in electronics; but generally some contraction in jobs is expected linked to improving productivity. Nonetheless, the outlook for manufacturing within the CE projections is overall relative positive.

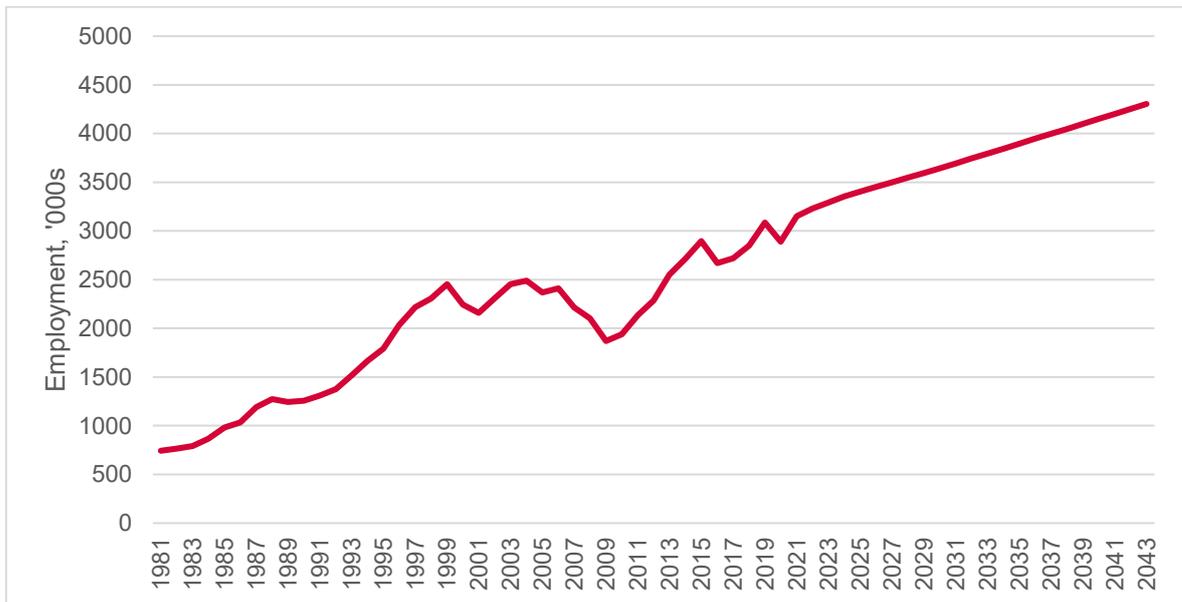
Table 6.3 Projected Employment and GVA Growth by Manufacturing Sub-Sector, Coventry & Warwickshire

	GVA, 2020 (£m)	GVA Growth, 2020-43 (% CAGR)	Employe nt, 2020 est (‘000s)	Employe nt Change, 2020-43 (‘000s)
Food, drink & tobacco	168.4	0.7%	3.9	-0.1
Textiles etc	43.4	0.2%	1.0	-0.4
Wood & paper	34.6	0.9%	0.9	0.1
Printing & recording	28.0	-0.7%	0.7	-0.3
Coke & petroleum	0.9	-0.5%	0.0	0.0
Chemicals	37.3	-0.1%	0.5	-0.3
Pharmaceuticals	30.5	0.5%	0.5	-0.2
Non-metallic mineral products	185.9	1.7%	5.4	-0.2
Metals & metal products	219.1	0.9%	7.5	-1.7
Electronics	97.9	3.4%	1.0	0.2
Electrical equipment	105.9	2.2%	1.3	0.0
Machinery	377.3	2.1%	5.5	-1.1
Motor vehicles	1952.8	3.4%	18.7	-1.6
Other transport equipment	409.2	3.8%	1.7	-0.1
Other manufacturing & repair	170.4	1.5%	4.4	-0.4

Source: Icen analysis of CE Projections

- 6.19 Employment in construction is expected to remain relatively static, albeit with GVA growing by 1.1%. This is influenced by productivity improvements.
- 6.20 GVA in wholesale, transport and warehousing is expected to grow by 1.4% pa, which is similar to the growth forecast for manufacturing and represents a relatively positive outlook for the sector. Employment growth of 8,800 (+14%) is expected across the sub-region over the 2019-43 period. As the chart below shows, employment growth is expected to be relatively consistent to the long-term trend. The projections will also build in some productivity improvements associated with increased automation.

Figure 6.4: Employment in Wholesale, Transport and Warehousing – Coventry & Warwickshire



Source: Icen analysis of Cambridge Econometrics Projections

6.21 A substantial proportion of overall employment growth is however focused on service-related sectors. The chart below analyses performance in these activities. Overall key growth sectors include:

- Food and beverage services, with expected growth in employment of 18,800 across the sub-region. This looks to us potentially optimistic.
- IT Services, which has been a growing sector, and is expected to post very impressive growth with 10,900 jobs created. This will include the cluster of gaming activities.
- Some growth in other sectors which have typically been office based including head offices/management consultancy; real estate; architecture/engineering and other professional services;
- Some growth in public sector dominated sectors, particularly in education which is expected to see 10,900 additional jobs; as well as more modest growth in public admin and health;
- Growth in employment in residential and social care, no doubt driven in particular by changing demographics.

Table 6.4 Employment Trends and Projections – Service Sector – Coventry & Warwickshire

Employment, '000s	2001-19	2019-20	2020-43	2019-43	% Change, 2019-43
Accommodation	-0.2	0.2	-0.5	-0.3	-4%
Food & beverage services	4.7	1.0	17.8	18.8	74%
Media	0.8	0.5	0.0	0.6	26%
IT services	2.9	2.1	8.8	10.9	79%
Financial & insurance	-1.6	0.1	-0.6	-0.5	-4%
Real estate	3.7	0.1	1.5	1.6	23%
Legal & accounting	3.1	-0.3	0.7	0.4	6%
Head offices & management consultancies	12.5	0.6	3.8	4.4	26%
Architectural & engineering services	4.3	1.0	1.4	2.4	21%
Other professional services	2.1	-0.7	2.2	1.5	14%
Business support services	14.4	-3.9	8.7	4.8	11%
Public Administration & Defence	-1.0	-0.3	2.5	2.2	13%
Education	11.9	0.9	10.0	10.9	23%
Health	11.1	0.8	3.1	4.0	13%
Residential & social	9.2	-1.7	7.2	5.5	22%
Arts	3.5	-0.5	-1.2	-1.7	-27%
Recreational services	1.0	-0.1	1.6	1.5	22%
Other services	2.2	-0.7	-0.2	-0.9	-6%

Source: Icen analysis of Cambridge Econometrics Projections

Outlook for Individual Authorities

- 6.22 The outlook for individual authorities is set out below. Employment is projected to grow by 63,500 across the sub-region over the period to 2043. The strongest absolute growth is expected in Coventry, followed by Warwick. But relative to its existing employment, North Warwickshire is expected to post the strongest proportional growth. Weaker relative growth is expected in Nuneaton and Bedworth (9%).

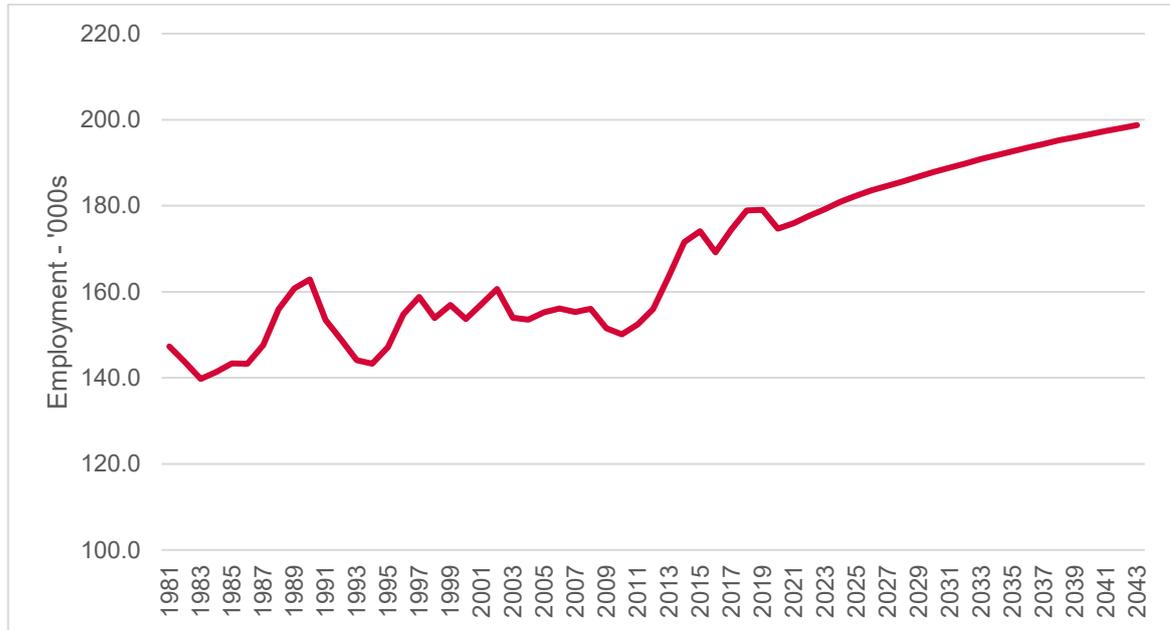
Table 6.5 Projected Growth in Employment by District

	2019	2043	Change	% Change
Coventry	179.1	198.8	19.7	11%
North Warwickshire	53.9	62.6	8.8	16%
Nuneaton & Bedworth	54.8	59.7	4.9	9%
Rugby	55.8	63.6	7.8	14%
Stratford-on-Avon	85.2	94.3	9.1	11%
Warwick	98.1	111.5	13.3	14%
C&W	526.9	590.4	24	12%

Source: Icen analysis of Cambridge Econometrics Projections

6.23 The outlook for Coventry is relatively positive. As the graph below shows, employment was relatively static through the 1990s and 2000s, but the City's economy has performed notably better since with relatively strong growth recorded since 2011. The outlook is not as strong as this, but certainly exceeds the long-term trend.

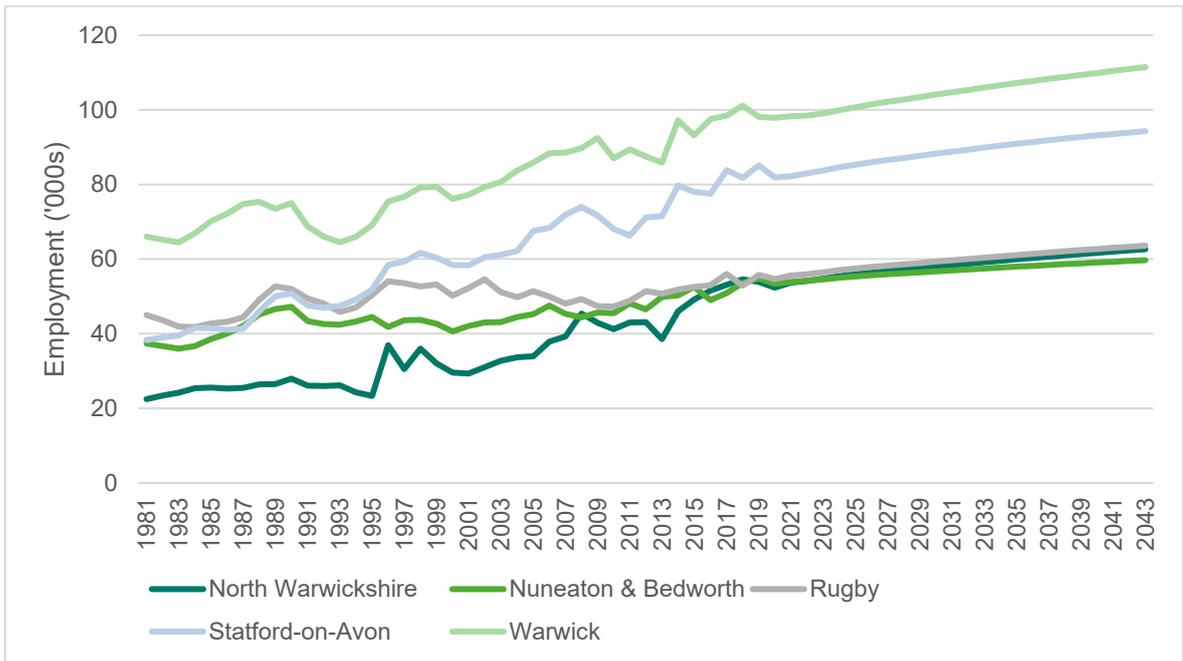
Figure 6.5: Employment Projection – Coventry



Source: Icen analysis of Cambridge Econometrics Projections

6.24 For the Warwickshire authorities, it is notable that North Warwickshire's stronger relative performance is consistent with the historic trend.

Figure 6.6: Employment Projections – Warwickshire Authorities



Source: Icen analysis of Cambridge Econometrics Projections

7. RELATIONSHIP BETWEEN HOUSING AND ECONOMIC GROWTH

7.1 The analysis in this section considers the relationship between housing and economic growth; seeking to understand what level of jobs might be supported by changes to the local labour supply (which will be influenced by population change). To look at estimates of the job growth to be supported, a series of stages are undertaken. These can be summarised as:

- Estimate changes to the economically active population (this provides an estimate of the change in labour-supply);
- Overlay information about commuting patterns, double jobbing (i.e. the fact that some people have more than one job) and potential changes to unemployment; and
- Bringing together this information will provide an estimate of the potential job growth supported by the population projections

7.2 The analysis then moves on to look at the labour-supply growth likely to be required to meet job growth forecasts and then convert this into an estimate of household growth and hence housing need.

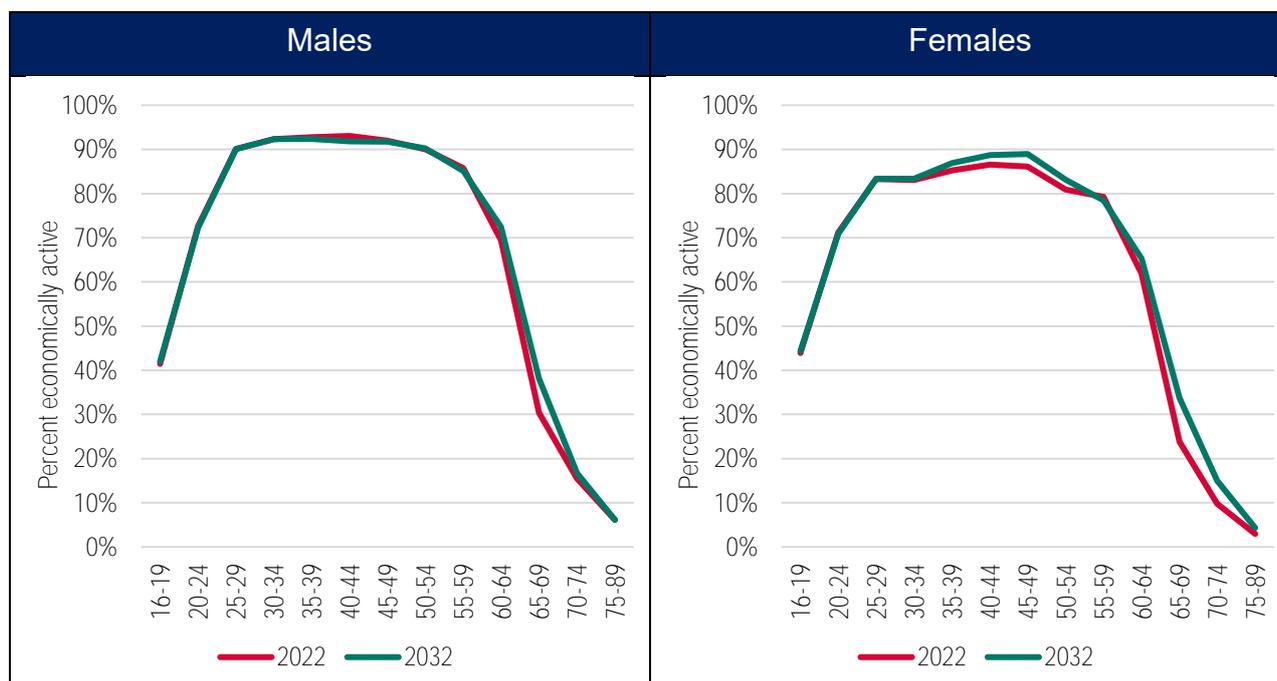
7.3 The analysis mainly looks at economic growth and housing in the 2022-32 period to be consistent with analysis around demographics and housing need although it is recognised that plans will extend beyond this date (and so the direction of economic forecasts post 2032 have also been referenced in this section).

Growth in Resident Labour Supply

7.4 The approach taken in this report is to derive a series of age and sex specific economic activity rates and use these to estimate how many people in the population will be economically active as projections develop. This is a fairly typical approach with data being drawn in this instance from the Office for Budget Responsibility (OBR) – July 2018 (Fiscal Sustainability Report).

7.5 The figure and table below show the assumptions made (for Coventry & Warwickshire). The analysis shows that the main changes to economic activity rates are projected to be in the 60-69 age groups – this will to a considerable degree link to changes to pensionable age, as well as general trends in the number of older people working for longer (which in itself is linked to general reductions in pension provision). Whilst data is presented for the whole of the HMA, all analysis has been developed on an individual local authority area basis.

Figure 7.1 Projected changes to economic activity rates (2022 and 2032) – Coventry & Warwickshire



Source: Based on OBR and Census (2011) data

Table 7.1 Projected changes to economic activity rates (2022 and 2032) – Coventry & Warwickshire

	Males			Females		
	2022	2032	Change	2022	2032	Change
16-19	41.5%	42.0%	0.5%	43.9%	44.3%	0.4%
20-24	72.6%	72.2%	-0.4%	71.2%	70.9%	-0.3%
25-29	90.1%	90.1%	0.0%	83.3%	83.4%	0.0%
30-34	92.3%	92.3%	0.0%	83.1%	83.4%	0.3%
35-39	92.8%	92.4%	-0.4%	85.2%	86.9%	1.6%
40-44	93.1%	91.8%	-1.2%	86.6%	88.7%	2.2%
45-49	92.0%	91.7%	-0.3%	86.1%	89.0%	2.9%
50-54	90.0%	90.2%	0.2%	80.9%	83.1%	2.2%
55-59	85.7%	85.1%	-0.6%	79.2%	78.4%	-0.8%
60-64	69.4%	72.4%	3.0%	61.8%	65.3%	3.5%
65-69	30.4%	38.1%	7.7%	23.8%	33.7%	9.9%
70-74	15.5%	16.7%	1.2%	9.8%	15.0%	5.2%
75-89	6.1%	6.1%	0.0%	3.0%	4.3%	1.4%

Source: Based on OBR and Census (2011) data

7.6 Working through an analysis of age and sex specific economic activity rates it is possible to estimate the overall change in the number of economically active people in the Council area – this is set out in the tables below. The analysis shows that the main demographic projection (based on 10 year

demographic trends) results in growth in the economically-active population of 37,700 people – an 8% increase.

Table 7.2 Estimated change to the economically active population (2022-32) – Coventry & Warwickshire (10-year demographic trends)

	Economically active (2022)	Economically active (2032)	Total change in economically active	% change
Coventry	176,759	195,195	18,436	10.4%
North Warwickshire	34,848	34,981	134	0.4%
Nuneaton & Bedworth	70,986	74,005	3,019	4.3%
Rugby	64,196	70,300	6,104	9.5%
Stratford-on-Avon	72,350	76,494	4,144	5.7%
Warwick	80,644	86,555	5,911	7.3%
Warwickshire	323,023	342,335	19,312	6.0%
Coventry & Warwickshire	499,782	537,530	37,748	7.6%

Source: Derived from demographic projections

Linking Changes to Resident Labour Supply and Job Growth

7.7 The analysis above has set out potential scenarios for the change in the number of people who are economically active. However, it is arguably more useful to convert this information into an estimate of the number of jobs this would support. The number of jobs and resident workers required to support these jobs will differ depending on three main factors:

- Commuting patterns – where an area sees more people out-commute for work than in-commute it may be the case that a higher level of increase in the economically active population would be required to provide a sufficient workforce for a given number of jobs (and vice versa where there is net in-commuting);
- Double jobbing – some people hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs; and
- Unemployment – if unemployment were to fall then the growth in the economically active population would not need to be as large as the growth in jobs (and vice versa).

Commuting Patterns

7.8 The table below shows summary data about commuting to and from Coventry-Warwickshire from the 2011 Census. Overall, the data shows that the HMA sees a level of net in-commuting for work with the number of people resident in the area who are working being about 3% lower than the total number who work in the area. This number is shown as the commuting ratio in the final row of the

table and is calculated as the number of people living in an area (and working) divided by the number of people working in the area (regardless of where they live). Figures for individual authorities show net in-commuting to most areas, the exceptions being Nuneaton & Bedworth and Rugby.

Table 7.3 Commuting patterns in Coventry & Warwickshire

	Coventry	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on-Avon	Warwick	C-W
Live and work in Local Authority (LA)	78,767	8,567	22,121	21,443	23,266	31,809	-
Home workers	10,157	3,451	4,443	5,297	10,476	8,380	-
No fixed workplace	9,367	2,446	3,897	3,410	4,835	4,287	-
In-commute	50,630	25,304	15,048	17,551	25,435	33,760	-
Out-commute	39,851	16,954	29,955	20,566	22,800	25,593	-
Total working in LA	148,921	39,768	45,509	47,701	64,012	78,236	424,147
Total living in LA (and working)	138,142	31,418	60,416	50,716	61,377	70,069	412,138
Commuting ratio	0.928	0.790	1.328	1.063	0.959	0.896	0.972

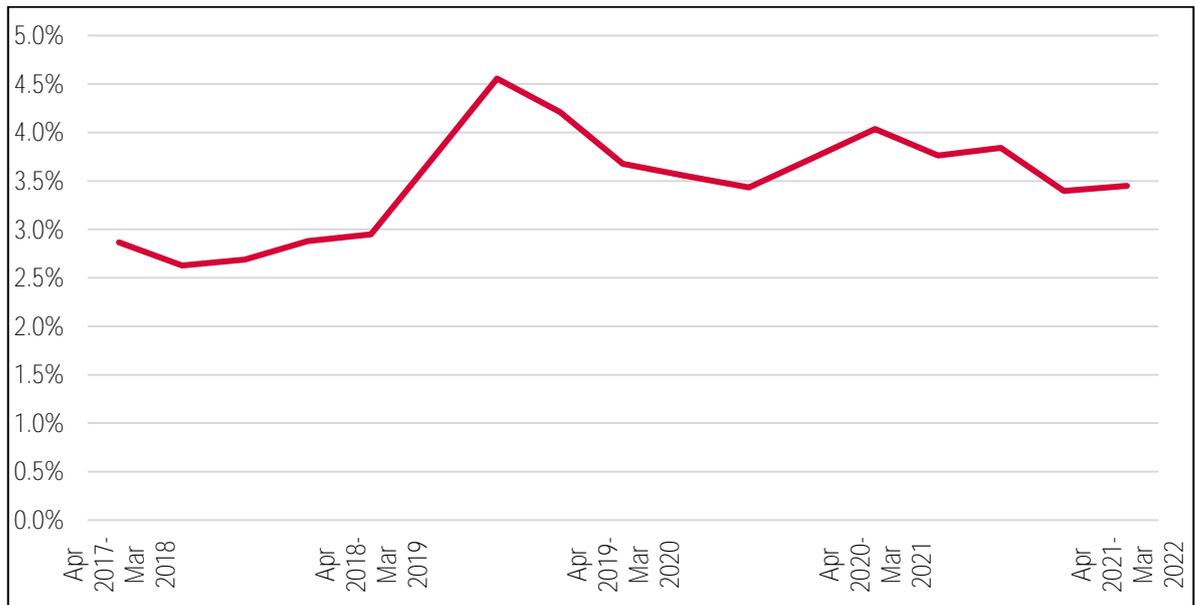
Source: 2011 Census

7.9 In translating the commuting pattern data into growth in the labour-force, a core assumption is that the commuting ratio remains at the same level as shown by the 2011 Census. A sensitivity has also been developed where commuting for new jobs is assumed to be on a 1:1 ratio (i.e. the increase in the number of people working in the Council area is equal to the number of people living in the Council area who are working). This sensitivity is useful to understand the implications for housing as to continue to assume net in-commuting would arguably mean that Coventry & Warwickshire would be providing jobs for people in housing in other local authorities. The 1:1 ratio is also useful in the context of Covid-19 with the likelihood being that a greater proportion of people will work from home (or mainly from home) in the future.

Double Jobbing

7.10 The analysis also considers that a number of people may have more than one job (double jobbing). This can be calculated as the number of people working in the local authority divided by the number of jobs. Data from the Annual Population Survey (available on the NOMIS website) for the past five years suggests across the HMA that typically about 3.5% of workers have a second job.

Figure 7.2 Percentage of all people in employment who have a second job (2017-2022) – Coventry & Warwickshire



Source: Annual Population Survey (from NOMIS)

7.11 For the purposes of this assessment it has been assumed that around 3.5% of people will have more than one job moving forward. A double jobbing figure 3.5% gives rise to a ratio of 0.965 (i.e. the number of jobs supported by the workforce will be around 3.5% higher than workforce growth). It has been assumed in the analysis that the level of double jobbing will remain constant over time, although the apparent upward trend should be noted.

7.12 For the analysis, estimates have also been made for individual local authorities, with double jobbing percentages for each area being shown below:

- Coventry – 3.3%
- North Warwickshire – 5.0%
- Nuneaton & Bedworth – 2.7%
- Rugby – 3.4%
- Stratford-on-Avon – 4.9%
- Warwick – 4.4%

Unemployment

7.13 The last analysis when looking at the link between jobs and resident labour supply is a consideration of unemployment. Essentially, this is considering if there is any latent labour force that could move back into employment to take up new jobs. This is particularly important given there is likely to have

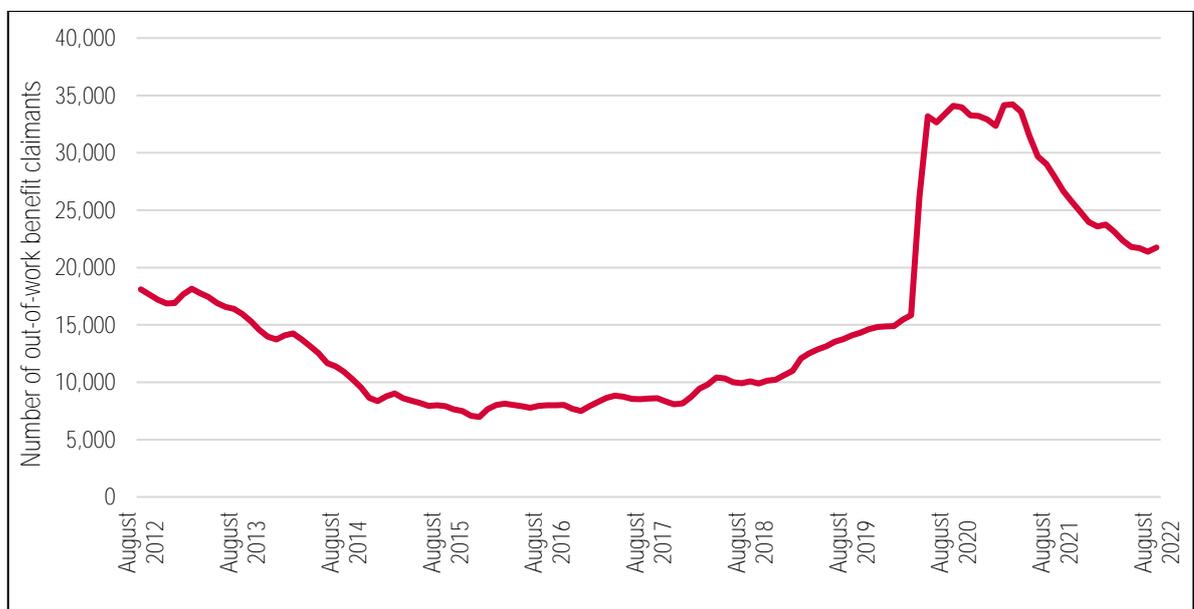
been notable increases in unemployment due to Covid-19, although it will be difficult to be precise about numbers, particularly as the impact of the ending of the furlough scheme are unknown.

7.14 The figure below looks at Claimant Count data (described as the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit who are out of work). This will not give a full picture of unemployment as not all those unemployed will be a claimant, but it will certainly help to provide an indication; claimant count data is available up to August 2022 with the data below showing a trend for the previous decade.

7.15 The analysis shows a clear increase in the number of claimants (presumably as a result of the pandemic) – rising from around 15,000 to approaching 35,000, dropping in the latest period for which data is provided to just over 20,000.

7.16 This analysis would suggest as of mid-2022 (the start point of the demographic projections) that there may be some latent labour supply in the HMA (i.e. people who are not currently working but who would return to work if there was a suitable job available). It is however clear that the majority of people losing jobs through the pandemic are back working. Therefore, whilst this analysis is interesting, it is considered that no additional allowance needs to be made for people moving back into the labour-supply post-2022.

Figure 7.3 Number of out-of-work benefit claimants (2012-2022) – Coventry-Warwickshire



Source: NOMIS

Jobs Supported by Growth in the Resident Labour Force

7.17 The tables below shows how many additional jobs might be supported by population growth under demographic trend based projections. Given current commuting patterns and estimates about double

jobbing, it is estimated that around 40,500 additional jobs could be supported by the changes to the resident labour supply in the demographic projection; a slightly lower number of jobs could be supported if the analysis assumes a 1:1 commuting ratio (39,200) to 2032.

Table 7.4 Jobs supported by demographic projections (2022-32) – 10-year trends

		Total change in economically active	Allowance for net commuting	Allowance for double jobbing (= jobs supported)
Census commuting	Coventry	18,436	19,875	20,562
	North Warwickshire	134	169	178
	Nuneaton & Bedworth	3,019	2,274	2,337
	Rugby	6,104	5,741	5,942
	Stratford-on-Avon	4,144	4,322	4,544
	Warwick	5,911	6,600	6,907
	Warwickshire	19,312	19,106	19,910
	Coventry-Warwickshire	37,748	38,981	40,471
1:1 commuting	Coventry	18,436	18,436	19,074
	North Warwickshire	134	134	141
	Nuneaton & Bedworth	3,019	3,019	3,103
	Rugby	6,104	6,104	6,318
	Stratford-on-Avon	4,144	4,144	4,357
	Warwick	5,911	5,911	6,186
	Warwickshire	19,312	19,312	20,105
	Coventry-Warwickshire	37,748	37,748	39,179

Source: Derived from a range of sources

Economic Growth and Housing Need – Job Forecasts

7.18 To look at estimates of the numbers of homes required to support jobs growth, the method which is followed is identical to that set out for translating homes into jobs but completed in reverse to get to a population growth.

7.19 This level of population growth is then applied to the household formation rates developed earlier in this report to get to a household growth. A final adjustment to reflect a level of vacancy in the housing stock is applied to the household growth to get to dwelling growth. The stages can be summarised as:

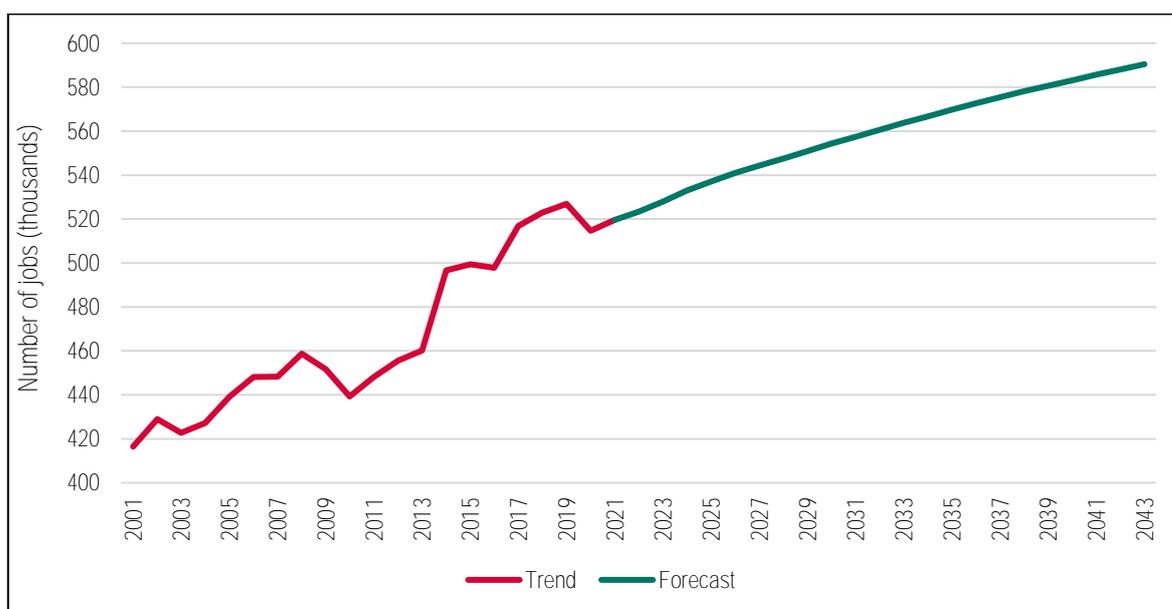
- Start with estimates of job growth;

- Estimate changes required to the economically active population to meet the jobs growth – this takes account of information about commuting patterns, double jobbing (i.e. the fact that some people have more than one job) and potential changes to unemployment;
- Flex levels of migration within the demographic model so that the change in the economically active population equals the change required to meet the number of jobs (migration can be ‘flexed’ up or down with stronger economic growth resulting in higher net in-migration as more people are required in the labour-supply); and
- Apply household representative rates to the resulting population projection and apply a vacancy allowance to calculate the number of households and dwellings needed.

7.20 The figure below shows past trends and a future forecast of job growth across the HMA – the data has been provided by Cambridge Econometrics (CE). Between 2022 and 2032 the forecast expects to see an increase of around 37,200 jobs, which is lower than any of the estimates of the number of jobs that could be supported when modelled against the demographic projections. Over the remainder of the period to 2043 (i.e. 2032-43) the forecast sees a further 29,900 jobs, annual job growth is therefore expected to slow down over time.

7.21 The forecast is also interesting for showing a drop in jobs from 2019 to 2020, consistent with the analysis of claimant count data previously set out. The forecast then shows a recovery in jobs from 2020, which is again consistent with other data.

Figure 7.5 Past trends and forecast future number of jobs in Coventry & Warwickshire



Source: Cambridge Econometrics

- 7.22 The table below shows jobs growth forecasts for each local authority area – two time periods are used (2022-32, and 2032-43). For all areas jobs growth is forecast to be stronger in the 10-year period to 2032 than the 11-year period to 2043.

Table 7.5 Forecast future jobs in Coventry & Warwickshire – by Local Authority

	Job growth (2022-32)	Job growth (2032-43)	Total (2022-43)
Coventry	12,192	8,924	21,116
North Warwickshire	4,638	3,844	8,482
Nuneaton & Bedworth	2,979	2,487	5,466
Rugby	4,117	3,567	7,684
Stratford-on-Avon	6,387	4,948	11,335
Warwick	6,910	6,107	13,017
Warwickshire	25,031	20,953	45,984
Coventry-Warwickshire	37,223	29,877	67,100

Source: Cambridge Econometrics

- 7.23 Icenl would note in particular that the forecasts for North Warwickshire have been influenced by a strong concentration of growth in certain sectors, including warehousing and logistics, which in turn has been influenced by the release/availability of land to support this. Clearly given the sub-regional nature of the market for these uses, there is potential for the future spatial distribution of warehousing growth to influence economic growth in the Borough (and therefore any calculations of housing need associated with this).

Economic Growth and Housing Need

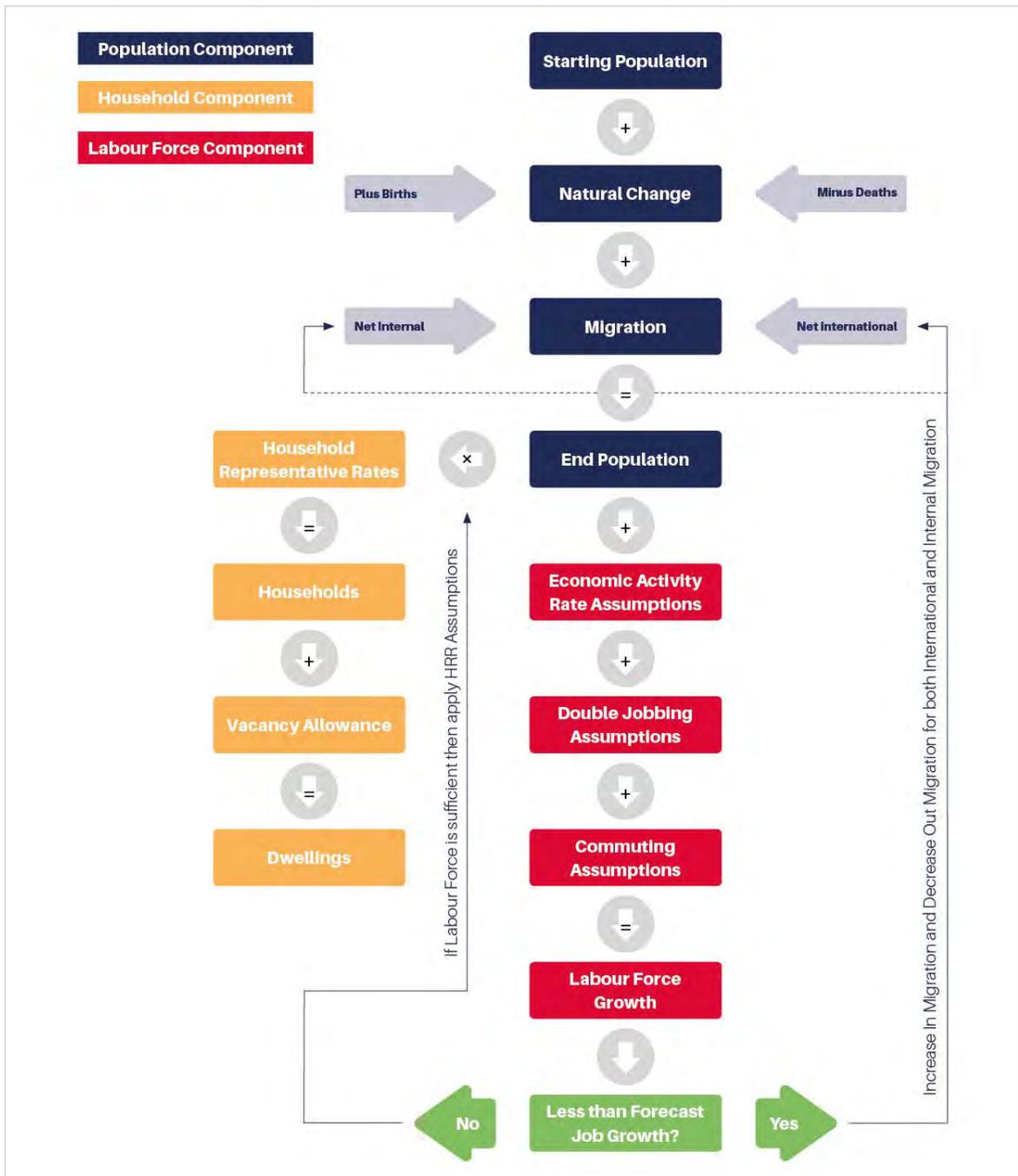
- 7.24 The demographic model developed to look at housing need has been used to consider the link between jobs and housing. Within the modelling, migration assumptions have been changed so that the increase in the economically active population matches the increase in the resident workforce required. Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%). In summary, the method includes the following assumptions:
- 7.25 In line with earlier assumptions on changes in economic participation and commuting, we assume an increase in the resident workforce in line with the growth in people in employment in each local authority (i.e. a 1:1 ratio between growth in people working and residents in work) as well as modelling a continuation of commuting dynamics shown by the 2011 Census.
- 7.26 The analysis also assumes that 3.5% of people hold down more than one job (variable by local authority), such that the growth in people in work is slightly lower than total jobs growth. The modelling assumes that the effects of the pandemic on unemployment will have receded (with unemployment falling) over the period to 2022. As a result, we do not therefore assume that there is

latent labour which could contribute to economic growth. If there was, this could have a modest effect in reducing the housing need.

7.27 The modelling also builds in assumptions on changes to economic participation taking account of increased longevity and later retirement. Assumptions from the Office for Budget Responsibility's 2018 Fiscal Sustainability Report have been adopted, which shows some increased economic participation in those in their 60s in particular (and particularly amongst women).

7.28 Once the level of economically active population matches the job growth forecast, the population (and its age structure) is modelled against the HRRs, using the HRRs in the 2014-based Household Projections with a 'part return to trend' adjustment to headship rates for those aged 25-44. The assumptions assume affordability improves in order to support improved household formation amongst younger households, moving back towards longer-term trends over time. A 3% vacancy allowance is then included in relating household growth to housing need, consistent with the approach earlier in this report. A full overview of the approach is set out in the Figure below.

Figure 7.6: Economic Led Housing Need Model



Source: Icen Projects

7.29 The first part of the analysis is to estimate what level of growth in the labour supply would be needed for the job growth forecast to be met. This calculation is shown below and for example shows that to meet 37,223 jobs there would need to be an increase in the economically active population of 35,742 persons in the sub-region if a 1 to 1 ratio of residents to new jobs is used. This figure drops slightly (to 34,226) if Census commuting ratios are applied to the data.

Table 7.6 Forecast job growth and change in resident workforce with double jobbing and Census commuting patterns (2022-32)

	Number of additional jobs (2022-32)	Additional People in work (after double jobbing allowance) (i.e. 1:1 scenario)	Additional People in work (after commuting allowance)
Coventry	12,192	11,785	10,932
North Warwickshire	4,638	4,404	3,480
Nuneaton & Bedworth	2,979	2,898	3,848
Rugby	4,117	3,977	4,229
Stratford-on-Avon	6,387	6,075	5,825
Warwick	6,910	6,603	5,913
Warwickshire	25,031	23,958	23,294
Coventry-Warwickshire	37,223	35,742	34,226

Source: Derived from a range of sources

7.30 Drawing through the modelling assumptions set out upfront, the tables below show estimates of housing need set against the job growth scenarios. The analysis shows with 2011 Census commuting patterns a need across the whole HMA for 3,697 dwellings per annum; this increases slightly (to 3,792 per annum) if a 1 to 1 ratio between additional jobs and residents in employment is assumed.

Table 7.7 Economic-led Housing Need – linking to 2011 Census commuting patterns

	Households 2022	Households 2032	Change in households	Per annum	Dwellings (per annum)
Coventry	141,302	150,392	9,090	909	936
North Warwickshire	27,730	31,006	3,276	328	337
Nuneaton & Bedworth	57,334	61,548	4,214	421	434
Rugby	48,273	53,770	5,497	550	566
Stratford-on-Avon	61,153	68,715	7,561	756	779
Warwick	65,541	71,795	6,254	625	644
Warwickshire	260,031	286,834	26,803	2,680	2,761
Coventry-Warwickshire	401,332	437,226	35,893	3,589	3,697

Source: Demographic projections

Table 7.8 Economic-led Housing Need – linking to a 1:1 commuting pattern for additional jobs

	Households 2022	Households 2032	Change in households	Per annum	Dwellings (per annum)
Coventry	141,302	150,914	9,612	961	990
North Warwickshire	27,730	31,571	3,841	384	396
Nuneaton & Bedworth	57,334	60,950	3,616	362	372
Rugby	48,273	53,620	5,346	535	551
Stratford-on-Avon	61,153	68,871	7,717	772	795
Warwick	65,541	72,220	6,679	668	688
Warwickshire	260,031	287,231	27,200	2,720	2,802
Coventry-Warwickshire	401,332	438,145	36,812	3,681	3,792

Source: Demographic projections

Comparison with the Standard Method

- 7.31 Across the whole HMA, the economic forecasts do not suggest a need to increase housing numbers to ensure a sufficient labour-supply growth. Overall, it is estimated that between about 3,700 and 3,800 additional homes will be needed each year to provide a sufficient labour-supply. This compares with a need for around 4,900 homes pa (based on the preferred demographic projections applied through the standard method framework).
- 7.32 It is however worth briefly setting these figures out for individual local authorities (see table below). This shows for all areas apart from North Warwickshire that the need set against economic forecasts is generally lower than shown by the demographic based assessment.

Table 7.9 Comparing annual housing need under range of scenarios

	Standard Method	Revised Standard Method	Economic growth (Census commuting)	Economic growth (1:1 commuting)
Coventry	3,188	1,964	936	990
North Warwickshire	176	119	337	396
Nuneaton & Bedworth	435	409	434	372
Rugby	516	735	566	551
Stratford-on-Avon	564	868	779	795
Warwick	675	811	644	688
Warwickshire	2,366	2,942	2,761	2,802
Coventry-Warwickshire	5,554	4,906	3,697	3,792

Source: Range of sources

-
- 7.33 The evidence suggests there is no case for uplifting housing need at the HMA level to support economic growth. For North Warwickshire the scale of economic growth will be influenced on future decisions on the delivery of strategic employment development (in particular for strategic B8 development) as addressed elsewhere in this report.
- 7.34 For North Warwickshire Borough there is a case for higher housing provision than the standard method baseline to manage cross-boundary commuting. This can however be achieved through questions of the distribution of housing provision; and North Warwickshire's existing Plan makes provision for meeting unmet needs from other areas (Coventry and Birmingham) which contribute to labour force growth and thus achieve this. These are however issues of distribution of housing need, rather than having any upward impact on the overall housing need given that the given inter-commuting between authorities it is appropriate to principally ensure that there is sufficient labour available at an HMA level.
- 7.35 For Nuneaton and Bedworth, the revised standard method figures generate a housing need which sits centrally between the economic parameters – meaning that the 409 dpa scenario would support local jobs growth assuming some reduction in the proportion of the workforce locally who commute out from the area. We consider this to be a realistic scenario given that out-commuting from the area is influenced by its relatively weaker employment base; and given the effects of changing working patterns. However the Council may still wish to consider these issues further in drawing together its evidence to inform a housing requirement within the local plan.

8. AFFORDABLE HOUSING NEED

Introduction

- 8.1 This section provides an assessment of the need for affordable housing in Coventry & Warwickshire and the six local authorities. The analysis specifically considers general needs housing, with further analysis of specialist housing (e.g. for older people) being discussed later in the report.
- 8.2 The analysis follows the PPG (Sections 2a-018 to 2a-024) and provides two main outputs, linked to Annex 2 of the NPPF – this is firstly an assessment of the need for social/affordable rented housing and secondly to consider the need for affordable home ownership products. It should be noted that whilst the analysis is segmented between rented and home ownership products, it would technically be possible for there to be some overlap between the two – for example if a home to buy was at a sufficient discount to be available to households unable to rent market housing, then arguably it would be meeting some of the rental need.
- 8.3 The analysis also considers First Homes, which looks likely to become a new tenure of affordable housing. Further information about First Homes was set out in a Planning Practice Guidance in May 2021.

Methodology Overview

- 8.4 The method for studying the need for affordable housing has been enshrined in Government practice guidance for many years, with an established approach to look at the number of households who are unable to afford market housing (to either rent or buy) – it is considered that this group will mainly be a target for rented affordable homes (social/affordable rented) and therefore the analysis looks at need for *'affordable housing for rent'* as set out in Annex 2 of the NPPF. The methodology for looking at the need for rented (social/affordable) housing considers the following:
- **Current affordable housing need:** an estimate of the number of households who have a need now, at the point of the assessment, based on data from the Council's Housing Register – this figure is then annualised so as to meet the current need over a period of time;
 - **Projected newly forming households in need:** using demographic projections to establish gross household formation, and then applying an affordability test to estimate numbers of such households unable to afford market housing;
 - **Existing households falling into need:** based on studying past trends in the types of households who have accessed social/affordable rented housing; and

-
- **Supply of affordable housing:** an estimate of the likely number of lettings that will become available from the existing social/affordable housing stock.

8.5 The first three bullet points above are added together to identify a gross need, from which the supply of relets of existing properties is subtracted to identify a net annual need for additional affordable housing. For the purposes of this assessment, this analysis is used to identify the overall (net) need for social/affordable rented housing.

8.6 This approach has traditionally been used to consider the needs of households who have not been able to afford market housing (either to buy or to rent). As the income necessary to afford to rent homes without financial support is typically lower than that needed to buy, the ability of households to afford private rents has influenced whether or not they are in need of affordable housing.

8.7 The NPPF and associated guidance has expanded the definition of those in affordable housing need to include households who might be able to rent without financial support but who aspire to own a home and require support to do so. The PPG includes households that “*cannot afford their own homes, either to rent, or to own, where that is their aspiration*” as having an affordable housing need.

8.8 This widened definition has been introduced by national Government to support increased access to home ownership, given evidence of declining home ownership and growth in private renting over the last 20 years or so. The PPG does not however provide specific guidance on how the needs of such households should be assessed and so this study adopts a broadly consistent methodology to that identified in the PPG which consider a current need; a newly-arising need on an annual basis; existing households falling into need; and an annual estimate of supply.

8.9 The analysis of affordable housing need is therefore structured to consider the need for rented affordable housing, and separately the need for affordable home ownership. The overall need is expressed as an annual figure, which can then be compared with likely future delivery (as required by PPG Paragraph 2a-024).

8.10 Whilst the need for social/affordable rented housing and affordable home ownership are analysed separately, there are a number of pieces of information that are common to both assessments. In particular, this includes an understanding of local housing costs, incomes and affordability. The sections below therefore look at these factors.

Local Price and Rents

8.11 An important part of the affordable needs model is to establish the entry-level costs of housing to buy and rent. The affordable housing needs assessment compares prices and rents with the incomes of

households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an 'affordable housing need'. For the purposes of establishing affordable housing need, the analysis focuses on overall housing costs (for all dwelling types and sizes).

- 8.12 The analysis below considers the entry-level costs of housing to both buy and rent across the HMA. The approach has been to analyse Land Registry and ONS data to establish lower quartile prices and rents. Using a lower quartile figure is consistent with the PPG and reflects the entry-level point into the market recognising that the very cheapest properties may be of sub-standard quality.
- 8.13 Data from the Land Registry for the year to March 2022 shows estimated lower quartile property prices by dwelling type. The data shows that entry-level costs to buy are estimated to start from about £100,000 for a second-hand flat in Nuneaton & Bedworth and rising to £400,000 for a detached home in Warwick. Looking at the lower quartile price across all dwelling types, the analysis shows a lower quartile price of £155,000 in Nuneaton & Bedworth, rising to £245,000 in Stratford-on-Avon and Warwick. The figures are all based on cost of existing homes in the market although newbuild prices are considered later in this section when looking at potential costs of affordable home ownership properties.

Table 8.1 Estimated lower quartile cost of housing to buy by type (existing dwellings) – year to March 2022 – Coventry-Warwickshire

	Flat/ maisonette	Terraced	Semi- detached	Detached	All dwellings
Coventry	£105,000	£162,000	£191,000	£288,000	£164,000
North Warwickshire	£115,000	£151,000	£189,950	£280,000	£175,000
Nuneaton & Bedworth	£100,000	£135,000	£173,000	£255,000	£155,000
Rugby	£115,000	£166,000	£215,000	£320,000	£191,000
Stratford-on-Avon	£138,750	£217,500	£260,000	£390,000	£245,200
Warwick	£160,000	£245,000	£270,000	£400,000	£245,000

Source: Land Registry

- 8.14 It is also useful to provide estimates of property prices by the number of bedrooms in a home. Analysis for this draws together Land Registry data with an internet search of prices of homes for sale (using sites such as Rightmove). In many areas, there was less information about 1-bedroom homes and so these price estimates should be treated with some caution (no estimate has been made for North Warwickshire).

Table 8.2 Estimated lower quartile cost of housing to buy by size (existing dwellings) – year to March 2022 – local authorities

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms	All dwellings
Coventry	£97,000	£140,000	£202,000	£264,000	£164,000
N Warwks	-	£141,000	£196,000	£309,000	£175,000
N & B	£97,000	£130,000	£189,000	£287,000	£155,000
Rugby	£116,000	£150,000	£237,000	£373,000	£191,000
SoA	£144,000	£201,000	£277,000	£432,000	£245,200
Warwick	£150,000	£204,000	£296,000	£438,000	£245,000

Source: Land Registry and Internet Price Search

- 8.15 A similar analysis has been carried out for private rents using ONS data – this covers a 12-month period to March 2022. For the rental data, information about dwelling sizes is provided (rather than types). The analysis shows costs both including and excluding room rents, although the difference is not significant in most areas. The analysis shows an average lower quartile cost (across all dwelling sizes excluding room rents) of between £580 per month in Nuneaton & Bedworth and £750 in Warwick.

Table 8.3 Lower Quartile Market Rents, year to March 2022

	Coventry	N Warwks	N & B	Rugby	SoA	Warwick
Room only	£390	-	£303	£420	£600	-
Studio	£450	£400	£420	£525	£423	£510
1-bedroom	£540	£463	£450	£550	£625	£650
2-bedrooms	£650	£600	£575	£660	£745	£785
3-bedrooms	£750	£695	£650	£795	£895	£925
4-bedrooms	£1,000	£950	£895	£1,055	£1,200	£1,250
All properties	£625	£600	£540	£625	£725	£750
Ex. room only	£635	£600	£580	£635	£725	£750

Source: ONS

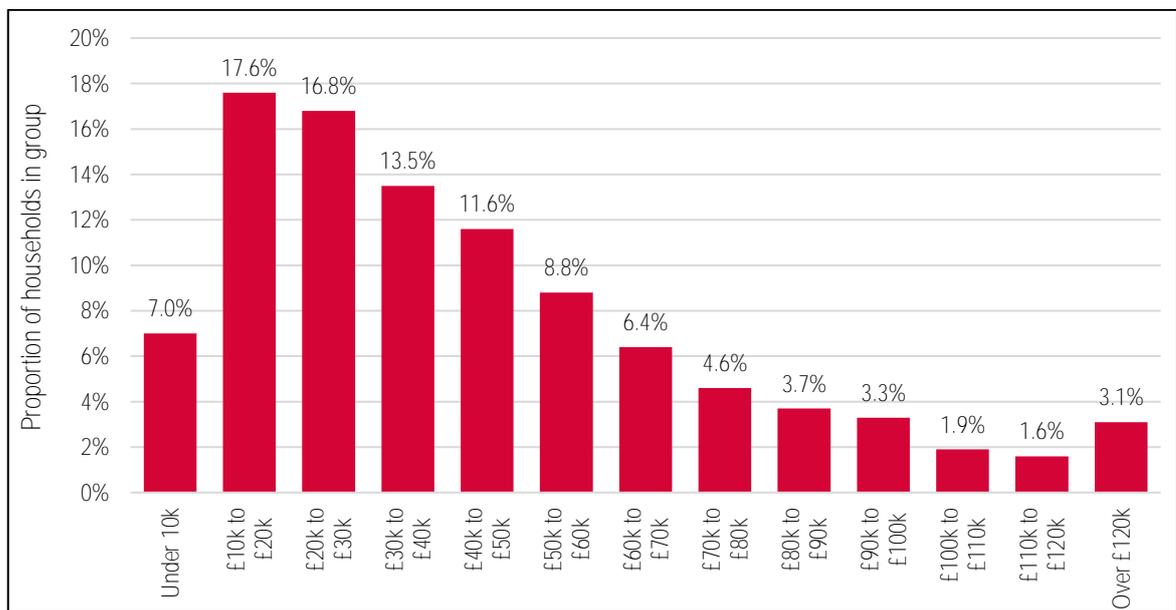
Household Incomes

- 8.16 Following on from the assessment of local prices and rents it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability (i.e. the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy). Data about total household income has been based on ONS modelled income estimates, with

additional data from the English Housing Survey (EHS) being used to provide information about the distribution of incomes.

8.17 Drawing all of this data together an income distribution for each local authority has been constructed for 2022. The figure below shows the distribution of income for Coventry and Warwickshire. Across the whole study area around a quarter of households have an income below £20,000 with a further third in the range of £20,000 to £40,000. The average (mean) income is estimated to be around £44,300, with a median income of £36,100; the lower quartile income of all households is estimated to be £20,200..

Figure 8.1 Distribution of household income (2022) – Coventry-Warwickshire



Source: Derived from a range of data

8.18 Analysis has also been undertaken to estimate how incomes vary by local authority, with the table below showing the estimated median household income in each area, the table also shows the variance in incomes from the study area average. There is some variation in the estimated incomes by area, median figures ranging from £30,200 in Coventry, up to £42,700 in Warwick. It is notable that all authorities in Warwickshire (apart from Nuneaton & Bedworth) have an average income above the study area average.

Table 8.4 Estimated average (median) household income by local authority (mid-2022 estimate)

	Median income	As a % of C & W average
Coventry	£30,200	84%
North Warwickshire	£37,700	104%
Nuneaton & Bedworth	£33,600	93%
Rugby	£39,200	108%
Stratford-on-Avon	£43,100	119%
Warwick	£42,700	118%
Coventry-Warwickshire	£36,100	100%

Source: Derived from a range of data

Affordability Thresholds

- 8.19 To assess affordability two different measures are used; firstly to consider what income levels are likely to be needed to access private rented housing (this establishes those households in need of social/affordable rented housing) and secondly to consider what income level is needed to access owner occupation (this, along with the first test helps to identify households in the 'gap' between renting and buying). This analysis therefore brings together the data on household incomes with the estimated incomes required to access private sector housing. Additionally, different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households).
- 8.20 To assess affordability two different measures are used; firstly to consider what income levels are likely to be needed to access private rented housing (this establishes those households in need of social/affordable rented housing) and secondly to consider what income level is needed to access owner occupation (this, along with the first test helps to identify households in the 'gap' between renting and buying). This analysis therefore brings together the data on household incomes with the estimated incomes required to access private sector housing. Additionally, different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households).
- 8.21 A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis – the PPG does not provide any guidance on this issue. CLG SHMA Guidance prepared in 2007 suggested that 25% of income is a reasonable start point, it also noted that a different figure could be used depending on local housing costs.

- 8.22 At £540-£750 per calendar month, lower quartile rent levels in Coventry & Warwickshire are typically average or above average in comparison to those seen nationally (a lower quartile rent of £595 for England in the year to March 2022). This would suggest that a proportion of income to be spent on housing could be higher than the bottom end of the range (the range starting from 25%). On balance, it is considered that a threshold of 30% is reasonable in a local context, to afford a £600 pcm rent (a typical figure across the study area) this would imply a gross household income of about £24,000 (and in net terms the rent would likely be around 36% of income).
- 8.23 In reality, many households may well spend a higher proportion of their income on housing and therefore would have less money for other living costs – for the purposes of this assessment these households would essentially be assumed as ideally having some form of subsidised rent so as to ensure a sufficient level of residual income.
- 8.24 Generally, the income required to access owner-occupied housing is higher than that required to rent and so the analysis of the need for social/affordable rented housing is based on the ability to afford to access private rented housing. However, local house prices (and affordability) are important when looking at the need for affordable home ownership.
- 8.25 For the purposes of this assessment, the income thresholds for owner-occupation assume a household has a 10% deposit and can secure a mortgage for four and a half times their salary. These assumptions are considered to be broadly in line with typical lending practices although it is recognised that there will be differences on a case by case basis.
- 8.26 The table below shows the estimated incomes required to both buy and rent (privately) in each local authority. This shows a notable 'gap' in most areas across the study area, particularly locations with higher house prices. The information in the tables below is taken forward into further analysis in this section to look at affordable needs in different locations.

Table 8.5 Estimated Household Income Required to Buy and Privately Rent by local authority – Coventry & Warwickshire

	To buy	To rent (privately)	Income gap
Coventry	£32,800	£25,400	£7,400
North Warwickshire	£35,000	£24,000	£11,000
Nuneaton & Bedworth	£31,000	£23,200	£7,800
Rugby	£38,200	£25,400	£12,800
Stratford-on-Avon	£49,040	£29,000	£20,040
Warwick	£49,000	£30,000	£19,000

Source: Based on Housing Market Cost Analysis

Need for Social/Affordable Rented Housing

8.27 The sections below work through the various stages of analysis to estimate the need for social/affordable housing in each local authority. Final figures are provided as an annual need (including an allowance to deal with current need). As per 2a-024 of the PPG, this figure can then be compared with likely delivery of affordable housing.

Current Need

8.28 In line with PPG paragraph 2a-020, the current need for affordable housing has been based on considering the likely number of households with one or more housing problems. The table below sets out the categories in the PPG and the sources of data being used to establish numbers. The PPG also includes a category where households cannot afford to own despite it being their aspiration – this category is considered separately in this report (under the title of the need for affordable home ownership).

Table 8.6 Main sources for assessing the current need for affordable housing

	Source	Notes
Homeless households (those in temporary accommodation)	MHCLG Statutory Homelessness data	Household in temporary accommodation at end of quarter.
Households in overcrowded housing	Census table LC4108EW	Analysis undertaken by tenure and updated by reference to national changes (from the English Housing Survey (EHS))
Concealed households	Census table LC1110EW	Number of concealed families
Existing affordable housing tenants in need	Modelled data linking to past survey analysis	Excludes overcrowded households – tenure estimates updated by reference to the EHS
Households from other tenures in need	Modelled data linking to past survey analysis	

Source: PPG [2a-020]

8.29 It should be noted that there may be some overlap between categories (such as overcrowding and concealed households, whereby the overcrowding would be remedied if the concealed household moved). The data available does not enable analysis to be undertaken to study the impact of this and so it is possible that the figures presented include a small element of double counting (although this is likely to be small). Additionally, some of the concealed households may be older people who have moved back in with their families and might not be considered as in need.

8.30 The table below shows the initial estimate of the number of households within each local authority with a current housing need. These figures are before any 'affordability test' has been applied to

assess the ability of households to meet their own housing needs; and has been termed 'the number of households in unsuitable housing'. Overall, the analysis estimates that there are currently some 31,000 households living in unsuitable housing (or without housing), with around half of these being in Coventry.

Table 8.7 Estimated Number of Households Living in Unsuitable Housing – Coventry & Warwickshire

	Homeless/ concealed households	Households in overcrowded housing	Existing affordable housing tenants in need	Households from other tenures in need	Total
Coventry	2,469	8,747	496	3,561	15,273
North Warwickshire	292	775	84	531	1,683
Nuneaton & Bedworth	729	1,670	173	1,131	3,703
Rugby	469	1,256	136	954	2,815
Stratford-on-Avon	539	1,060	152	1,146	2,897
Warwick	705	2,208	178	1,522	4,614
Warwickshire	2,734	6,970	723	5,284	15,711
C & W	5,203	15,717	1,219	8,845	30,984

Source: MHCLG Live Tables, Census 2011 and Data Modelling

- 8.31 In taking this estimate forward, the data modelling next estimates housing unsuitability by tenure. From the overall number in unsuitable housing, households living in affordable housing are excluded (as these households would release a dwelling on moving and so no net need for affordable housing will arise). The analysis also excludes 90% of owner-occupiers under the assumption (which is supported by analysis of survey data) that the vast majority will be able to afford housing once savings and equity are taken into account.
- 8.32 A final adjustment is to slightly reduce the unsuitability figures in the private rented sector to take account of student-only households – such households could technically be overcrowded/living in unsuitable housing but would be unlikely to be allocated affordable housing (student needs are essentially assumed to be transient). Once these households are removed from the analysis, the remainder are taken forward for affordability testing.
- 8.33 The tables below show it is estimated that there are around 17,400 households living in unsuitable housing (excluding current social tenants and the majority of owner-occupiers) in Coventry & Warwickshire.

Table 8.8 Unsuitable Housing by Tenure and Number to Take Forward into Affordability Modelling (Coventry & Warwickshire)

	In Unsuitable Housing	Number to Take Forward for Affordability Testing
Owner-occupied	7,429	743
Affordable housing	6,048	0
Private rented	12,304	11,464
No housing (homeless/concealed)	5,203	5,203
Total	30,984	17,410

Source: MHCLG Live Tables, Census 2011 and Data Modelling

- 8.34 Having established this figure, it needs to be considered that a number of these households might be able to afford market housing without the need for subsidy. To consider this, the income data has been used, with the distribution adjusted to reflect a lower average income amongst households living in unsuitable housing – for the purposes of the modelling an income distribution that reduces the average household income to 88% of the figure for all households has been used to identify the proportion of households whose needs could not be met within the market (for households currently living in housing). A lower figure of 42% has been used to apply an affordability test for the concealed/homeless households who do not currently occupy housing.
- 8.35 These two percentage figures have been based on a consideration of typical income levels of households who are in unsuitable housing (based mainly on estimates in the private rented sector) along with typical income levels of households accessing social rented housing (for those without accommodation).
- 8.36 The figures have been based on analysis of the English Housing Survey (mainly looking at relative incomes of households in each of the private and social rented sectors) as well as consideration of similar information collected through household surveys across the country by JGC. These modelling assumptions are considered reasonable and have not been challenged through the Local Plan process in other locations (where the same assumptions have been used).
- 8.37 Overall, around half of households with a current need are estimated to be likely to have insufficient income to afford market housing and so the estimate of the total current need is around 9,300 households across the study area – around half of the need estimated to be arising in the City. The table below shows how this is estimated to vary by local authority.

Table 8.9 Estimated Current Affordable Housing Need (for social/affordable rented housing)

	In unsuitable housing (taken forward for affordability test)	% Unable to Afford Market Housing (without subsidy)	Revised Gross Need (including Affordability)
Coventry	8,590	57.6%	4,952
North Warwickshire	832	47.7%	397
Nuneaton & Bedworth	1,947	52.2%	1,016
Rugby	1,664	46.2%	768
Stratford-on-Avon	1,651	49.1%	810
Warwick	2,726	48.4%	1,320
Warwickshire	8,819	48.9%	4,312
C & W	17,410	53.2%	9,264

Source: CLG Live Tables, Census 2011 and Data Modelling

- 8.38 The estimated figures shown above represents the number of households with a need currently. For the purposes of analysis, it is assumed that the local authorities would seek to meet this need over a period of time. To be consistent with the main period studied in the demographic projections (a ten-year period from 2022 to 2032) the need is annualised by dividing by 10 (to give an annual need for 926 dwellings across all areas). This does not mean that some households would be expected to wait 10-years for housing as the need is likely to be dynamic, with households leaving the current need as they are housed but with other households developing a need over time.

Newly Forming Households

- 8.39 The number of newly forming households has been estimated through demographic modelling with an affordability test also being applied. This has been undertaken by considering the changes in households in specific 5-year age bands relative to numbers in the age band below, 5 years previously, to provide an estimate of gross household formation.
- 8.40 The number of newly-forming households is limited to households forming who are aged under 45 – this is consistent with CLG guidance (from 2007) which notes after age 45 that headship (household formation) rates ‘plateau’. There may be a small number of household formations beyond age 45 (e.g. due to relationship breakdown) although the number is expected to be fairly small when compared with formation of younger households.
- 8.41 The number of newly forming households has been estimated through demographic modelling (linked to the alternative population projections and 2014-based HRRs). This is considered to provide the best view about trend-based household formation in Coventry & Warwickshire.

- 8.42 In assessing the ability of newly forming households to afford market housing, data has been drawn from previous surveys undertaken nationally by JGC. This establishes that the average income of newly forming households is around 84% of the figure for all households. This figure is remarkably consistent across areas (and is also consistent with analysis of English Housing Survey data at a national level).
- 8.43 The analysis has therefore adjusted the overall household income data to reflect the lower average income for newly forming households. The adjustments have been made by changing the distribution of income by bands such that average income level is 84% of the all household average. In doing this it is possible to calculate the proportion of households unable to afford market housing. For the purposes of the need for social/affordable rented housing this will relate to households unable to afford to buy OR rent in the market.
- 8.44 The assessment suggests overall that around two-fifths of newly forming households will be unable to afford market housing (to rent privately) and this equates a total of 3,600 newly forming households will have a need per annum on average across the study area – the table below provides a breakdown by local authority.

Table 8.10 Estimated Need for Social/Affordable Rented Housing from Newly Forming Households (per annum) – Coventry & Warwickshire

	Number of new households	% unable to afford	Annual newly forming households unable to afford to rent
Coventry	3,332	50.0%	1,667
North Warwickshire	446	36.7%	163
Nuneaton & Bedworth	1,060	40.6%	431
Rugby	1,053	37.8%	398
Stratford-on-Avon	1,024	38.7%	397
Warwick	1,400	40.8%	571
Warwickshire	4,982	39.3%	1,959
C & W	8,314	43.6%	3,627

Source: Projection Modelling/Affordability Analysis

Existing Households Falling into Affordable Housing Need

- 8.45 The second element of newly arising need is existing households falling into need. To assess this, information about past lettings in social/affordable rented has been used. The assessment looked at households who have been housed in general needs housing over the past three years – this group will represent the flow of households onto the Housing Register over this period. From this, newly forming households (e.g. those currently living with family) have been discounted as well as

households who have transferred from another social/affordable rented property. An affordability test has also been applied.

8.46 This method for assessing existing households falling into need is consistent with the 2007 SHMA guide which says on page 46 that *‘Partnerships should estimate the number of existing households falling into need each year by looking at recent trends. This should include households who have entered the housing register and been housed within the year as well as households housed outside of the register (such as priority homeless household applicants)’*.

8.47 Following the analysis through suggests a need arising from 1,501 existing households each year across the study area, with just over half of these households being in Coventry. The table below breaks this down by local authority.

Table 8.11 Estimated Need for Social/Affordable Rented Housing from Existing Households Falling into Need (per annum) – Coventry & Warwickshire

	Total Additional Need	% of Total
Coventry	653	43.5%
North Warwickshire	52	3.5%
Nuneaton & Bedworth	188	12.5%
Rugby	166	11.0%
Stratford-on-Avon	238	15.9%
Warwick	204	13.6%
Warwickshire	848	56.5%
C & W	1,501	100.0%

Source: Derived from a range of sources

Supply of Social/Affordable Rented Housing Through Relets

8.48 The future supply of affordable housing through relets is the flow of affordable housing arising from the existing stock that is available to meet future need. This focusses on the annual supply of social/affordable rent relets.

8.49 The Practice Guidance suggests that the estimate of likely future relets from the social rented stock should be based on past trend data which can be taken as a prediction for the future. Information from CoRe has been used to establish past patterns of social housing turnover. The figures are for general needs lettings but exclude lettings of new properties and also exclude an estimate of the number of transfers from other social rented homes. These exclusions are made to ensure that the figures presented reflect relets from the existing stock.

8.50 On the basis of past trend data it has been estimated that 2,221 units of social/affordable rented housing are likely to become available each year moving forward for occupation by newly forming

households and existing households falling into need from other tenures – around two-fifths of the supply is expected to arise in Coventry.

Table 8.12 Analysis of Past Social/Affordable Rented Housing Supply, 2018/19 – 2020/21 (average per annum) – Coventry & Warwickshire

	Total Lettings	% as Non-New Build	Lettings in Existing Stock	% Non-Transfers	Lettings to New Tenants
Coventry	1,506	88.2%	1,329	69.9%	929
North Warwickshire	219	91.0%	199	62.4%	124
Nuneaton & Bedworth	588	79.1%	465	67.3%	313
Rugby	480	73.4%	352	66.2%	233
Stratford-on-Avon	786	68.5%	539	55.1%	297
Warwick	782	73.2%	572	56.8%	325
Warwickshire	2,855	74.5%	2,128	60.7%	1,292
C & W	4,361	79.3%	3,457	64.3%	2,221

Source: CoRe/LAHS

- 8.51 The PPG model also includes the bringing back of vacant homes into use and the pipeline of affordable housing as part of the supply calculation. These have however not been included within the modelling in this report. Firstly, there is no evidence of any substantial stock of vacant homes (over and above a level that might be expected to allow movement in the stock). Secondly, with the pipeline supply, it is not considered appropriate to include this as to net off new housing would be to fail to show the full extent of the need, although in monitoring it will be important to net off these dwellings as they are completed.

Net Need for Social/Affordable rented Housing

- 8.52 The table below shows the overall calculation of affordable housing need. The analysis shows that there is a need for 3,833 dwellings per annum across the area – an affordable need is seen in all local authorities. The net need is calculated as follows:

$$\text{Net Need} = \text{Current Need (allowance for)} + \text{Need from Newly-Forming Households} + \text{Existing Households falling into Need} - \text{Supply of Affordable Housing}$$

Table 8.13 Estimated Need for Social/Affordable Rented Housing by local authority (per annum)

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	495	1,667	653	2,816	929	1,887
North Warwickshire	40	163	52	256	124	131
Nuneaton & Bedworth	102	431	188	720	313	407
Rugby	77	398	166	640	233	407
Stratford-on-Avon	81	397	238	716	297	419
Warwick	132	571	204	907	325	582
Warwickshire	431	1,959	848	3,238	1,292	1,946
C & W	926	3,627	1,501	6,054	2,221	3,833

Source: Range of sources

The Relationship Between Affordable Need and Overall Housing Need

8.53 The PPG is clear that there is not a direct relationship between affordable need and overall housing need. This is appropriate as the affordable need figures do not relate only to net changes in households but take account of the need for different types of housing from existing households. By implication the affordable needs figures shown reflect in part a tenure imbalance within the existing housing stock. Specifically, the PPG sets out in Para 67-001

How do the housing need of particular groups relate to overall housing need calculated using the standard method?

The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups.

This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. How can needs of different groups be planned for?

Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
- the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
- the anticipated deliverability of different forms of provision, having regard to viability.

Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty.

Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.

When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.

The household projections that form the baseline of the standard method are inclusive of all households including travellers as defined in [Planning policy for traveller sites](#).

- 8.54 However this needs to be read alongside PPG 2a-024 which encourages local authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need. Specifically, the wording of the PPG [2a-024] states:

'The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes'

- 8.55 The analysis estimates an annual need for 3,833 rented affordable homes, which is notionally 78% of a Local Housing Need of 4,906 dwellings per annum (as calculated using the Standard Method and the alternative population projection). The figures for individual authorities are set out below.
- 8.56 Current policy requirements for affordable housing, informed by viability evidence, expect between 20-40% affordable housing on qualifying sites. Actual delivery through planning obligations in many cases will be lower as some housing is delivered on sites below thresholds set out in policies, through permitted development or with lower provision due to site-specific viability issues. The right hand column in the table shows what level of provision of housing overall would be necessary to fully meet the affordable need and shows this would require approaching 14,000 homes a year across the HMA. This is evidently unrealistic, and the wider evidence in this report does not suggest that there is sufficient market housing demand or households to support this level of provision. Nonetheless it does support efforts to boost affordable housing delivery.

Table 8.14 Relating Affordable Need to the Adjusted Standard Method Findings

	Net Rented Need	Adjusted Standard Method	Affordable % Standard Method	Affordable Housing Policy Requirement	Notional Provision to Meet Rented Affordable Need in Full
Coventry	1,887	1,964	96%	25%	7,548
North Warwickshire	131	119	110%	30-40%	374
Nuneaton & Bedworth	407	409	100%	25%	1,628
Rugby	407	735	55%	20-30%	1,628
Stratford-on-Avon	419	868	48%	35%	1,197
Warwick	582	811	72%	40%	1,455
Warwickshire	1,946	2,942	66%		6,282
C & W	3,833	4,906	78%		13,830

- 8.57 The relationship between affordable housing need and overall housing need is clearly complex. This was recognised in the Planning Advisory Service (PAS) Technical Advice Note of July 2015. PAS conclude that there is no arithmetical way of combining the OAN (calculated through demographic projections) and the affordable need. There are a number of reasons why the two cannot be 'arithmetically' linked.
- 8.58 Firstly, the modelling contains a category in the projection of '*existing households falling into need*'; these households already have accommodation and hence if they were to move to alternative accommodation, they would release a dwelling for use by another household – there is no net need to provide additional homes. The modelling also contains '*newly forming households*'; these households are a direct output from the demographic modelling and are therefore already included in the overall housing need figures.
- 8.59 This just leaves the '*current need*'; much of this group will be similar to the existing households already described (in that they are already living in accommodation) although it is possible that a number will be households without housing (mainly concealed households) – these households are not included in the demographic modelling and so are arguably an additional need, although uplifts for market signals/affordability (as included in the Government's Standard Method) would be expected to deal with such households.
- 8.60 However, as noted, caution should be exercised in trying to make a direct link between affordable need and planned delivery, with the key point being that many of those households picked up as having a need will already be living in housing and so providing an affordable option does not lead to an overall net increase in the need for housing (as they would vacate a home to be used by someone else).

8.61 It is possible to investigate this in some more detail by re-running the model and excluding those already living in accommodation. This is shown in the table below which identifies that meeting these needs would lead to an affordable need for 1,812 homes per annum across the study area – notionally 37% of the Standard Method (based on the alternative demographic projection). This figure is theoretical and should not be seen to be minimising the need (which is clearly acute). It does however serve to show that there is a substantial difference in the figures when looking at overall housing shortages.

8.62 Indeed the main group of households in need are newly forming households. These households are already included within demographic projections and so the demonstrating of a need for this group again should not be seen as over and above any need derived through the normal process of looking at need. Indeed, only the 407 per annum (current need) is in addition to demographic projections and this scale of uplift will already have been included in figures when moving from a demographic starting point to an estimate of housing need using the Standard Method.

Table 8.15 Estimated Need for Social/Affordable Rented Housing by local authority (per annum) – excluding existing households

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	203	1,667	0	1,871	929	941
North Warwickshire	21	163	0	185	124	60
Nuneaton & Bedworth	55	431	0	485	313	172
Rugby	34	398	0	432	233	198
Stratford-on-Avon	40	397	0	437	297	140
Warwick	54	571	0	625	325	300
Warwickshire	204	1,959	0	2,163	1,292	871
C & W	407	3,627	0	4,034	2,221	1,812

Source: Range of sources

8.63 Additionally, it should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing). In reality, some (possibly many) households would see their circumstances change over time such that they would 'fall out of need' and this is not accounted for in the analysis. One example would be a newly forming household with an income level that means they spend more than 30% of income on housing, as the household's income rises they would potentially pass the affordability test and therefore not have an affordable need. Additionally, there is the likelihood when looking over the longer-term that a newly-forming household will become an

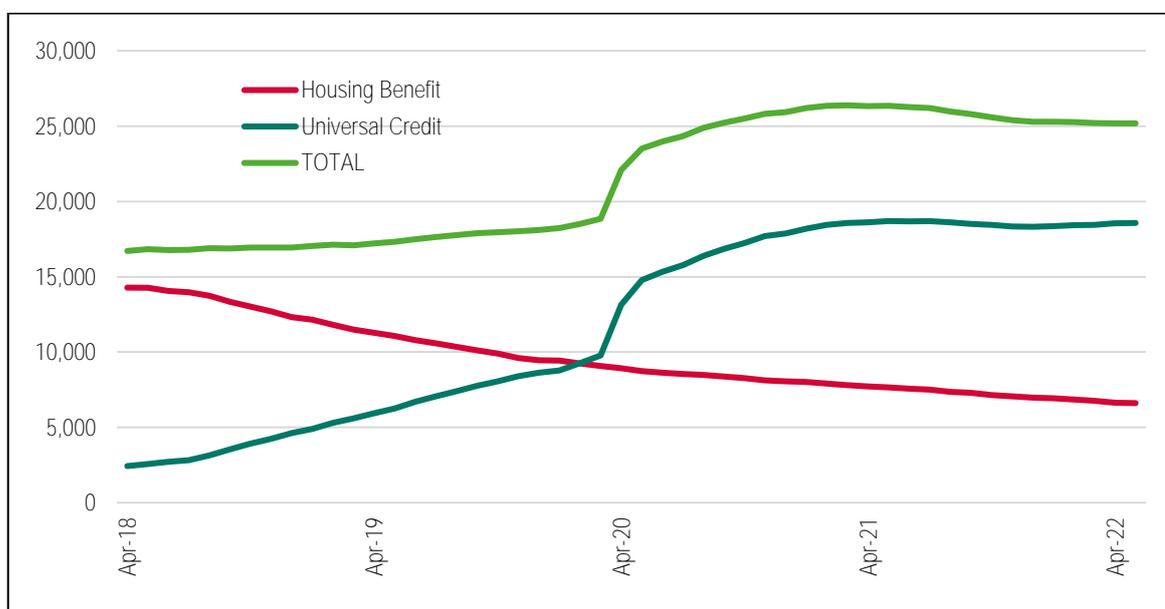
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- existing household in need and would be counted twice if trying to multiply the figures out for a whole plan period.
- 8.64 The affordable need shown is a reflection in part of historical funding decisions and Right-to-Buy sales which have influenced the level of provision of affordable homes.
- 8.65 It is however worth briefly thinking about how affordable need works in practice and the housing available to those unable to access market housing without Housing Benefit. In particular, the increasing role played by the Private Rented Sector (PRS) in providing housing for households who require financial support in meeting their housing needs should be recognised.
- 8.66 Whilst the Private Rented Sector (PRS) does not fall within the types of affordable housing set out in the NPPF (other than affordable private rent which is a specific tenure separate from the main 'full market' PRS), it has evidently been playing a role in meeting the needs of households who require financial support in meeting their housing need. Government recognises this, and indeed legislated through the 2011 Localism Act to allow Councils to discharge their "homelessness duty" through providing an offer of a suitable property in the PRS.
- 8.67 It is also worth reflecting on the NPPF (Annex 2) definition of affordable housing. This says: *'Affordable housing: housing for sale or rent, for those whose needs are not met by the market'* [emphasis added]. Clearly where a household is able to access suitable housing in the private rented sector (with or without Housing Benefit) it is the case that these needs are being met by the market (as within the NPPF definition). As such the role played by the private rented sector should be recognised – it is evidently part of the functioning housing market.
- 8.68 Data from the Department of Work and Pensions (DWP) has been used to look at the number of Housing Benefit supported private rented homes. As of May 2022, it is estimated that there were nearly 25,200 benefit claimants in the private rented sector in Coventry and Warwickshire. From this, it is clear that the PRS contributes to the wider delivery of 'affordable homes' with the support of benefit claims, and further complicates any attempts to find a relationship between affordable need and overall housing need.
- 8.69 The table below shows the number of households in each authority claiming Housing Benefit or Universal Credit where there is a housing entitlement (in the PRS). The figure below the table shows the trend in the number of claimants for the whole study area. This shows there has been a notable increase since March 2020, which is likely to be related to the Covid-19 pandemic. However, even the more historical data shows a substantial number of households claiming benefit support for their housing in the private sector (typically around 17,000-18,000 households).

Table 8.16 Number of Housing Benefit claimants in the private rented sector – local authorities (May 2022)

	Housing Benefit	Universal Credit (with housing allowance)	TOTAL
Coventry	3,544	9,661	13,205
North Warwickshire	437	1,001	1,438
Nuneaton & Bedworth	1,075	3,138	4,213
Rugby	429	2,079	2,508
Stratford-on-Avon	568	1,319	1,887
Warwick	556	1,382	1,938
C & W	6,611	18,580	25,191

Source: Department of Work and Pensions

Figure 8.2 Number of Housing Benefit claimants in the Private Rented Sector – Coventry & Warwickshire



Source: Department of Work and Pensions

- 8.70 Delivery of affordable housing through planning obligations is an important, but not the only means, of delivery affordable housing; and the Councils should also work with housing providers to secure funding to support enhanced affordable housing delivery on some sites and through use of its own land assets.
- 8.71 Overall, it is difficult to link the need for affordable housing to the overall housing need. Put simply the two do not measure the same thing and in interpreting the affordable need figure consideration needs to be given to the fact that many households already live in housing, and do not therefore generate an overall net need for an additional home. Further issues arise as the need for affordable housing is complex and additionally the extent of concealed and homeless households needs to be understood as well as the role played by the private rented sector.

8.72 The analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the six authorities. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise. It is a consideration in setting overall housing targets, but it should be recognised that viability and the availability of funding are realistically constraints on the level of provision which can be achieved.

Split Between Social and Affordable Rented Housing

8.73 The analysis above has studied the overall need for social and affordable rented housing with a focus on households who cannot afford to rent in the market. These households will therefore have a need for some form of rented housing at a cost below typical market rates. Typically, there are two main types of rented affordable accommodation (social and affordable rented) with the analysis below initially considering what a reasonable split might be between these two tenures.

8.74 An analysis has been undertaken to compare the income distribution of households with the cost of different products. Data about average social and affordable rents has been taken from the Regulator of Social Housing (RSH) and this is compared with lower quartile and median market rents (from ONS data). This analysis shows that social rents are lower than affordable rents; the analysis also shows that affordable rents are less than both lower quartile and median market rents – the data is fairly consistent across areas.

Table 8.17 Comparison of rent levels for different products – Coventry (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£325	£406	£540	£615	75%	66%
2-bedrooms	£378	£484	£650	£725	74%	67%
3-bedrooms	£418	£529	£750	£825	70%	64%
4-bedrooms	£471	£637	£1,000	£1,250	64%	51%
All	£374	£495	£635	£730	78%	68%

Source: RSH and ONS

Table 8.18 Comparison of rent levels for different products – North Warwickshire (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£353	£415	£463	£528	90%	79%
2-bedrooms	£419	£490	£600	£650	82%	75%
3-bedrooms	£455	£532	£695	£775	77%	69%
4-bedrooms	£501	£705	£950	£1,025	74%	69%
All	£427	£507	£600	£695	84%	73%

Source: RSH and ONS

Table 8.19 Comparison of rent levels for different products – Nuneaton & Bedworth (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£345	£408	£450	£475	91%	86%
2-bedrooms	£415	£494	£575	£625	86%	79%
3-bedrooms	£463	£547	£650	£695	84%	79%
4-bedrooms	£523	£723	£895	£935	81%	77%
All	£419	£508	£580	£625	88%	81%

Source: RSH and ONS

Table 8.20 Comparison of rent levels for different products – Rugby (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£360	£429	£550	£595	78%	72%
2-bedrooms	£428	£539	£660	£700	82%	77%
3-bedrooms	£467	£634	£795	£875	80%	72%
4-bedrooms	£543	£836	£1,055	£1,200	79%	70%
All	£436	£561	£635	£695	88%	81%

Source: RSH and ONS

Table 8.21 Comparison of rent levels for different products – Stratford-on-Avon (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£386	£503	£625	£675	80%	74%
2-bedrooms	£449	£604	£745	£775	81%	78%
3-bedrooms	£492	£680	£895	£1,025	76%	66%
4-bedrooms	£615	£806	£1,200	£1,400	67%	58%
All	£463	£616	£725	£795	85%	77%

Source: RSH and ONS

Table 8.22 Comparison of rent levels for different products – Warwick (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£387	£525	£650	£700	81%	75%
2-bedrooms	£467	£639	£785	£850	81%	75%
3-bedrooms	£528	£721	£925	£1,050	78%	69%
4-bedrooms	£612	£879	£1,250	£1,500	70%	59%
All	£464	£639	£750	£870	85%	73%

Source: RSH and ONS

8.75 For the affordability test, a standardised average rent for each product has been used. The table below suggests that around 19%-32% of households who cannot afford to rent privately could afford an affordable rent, with a further 19%-28% being able to afford a social rent (but not an affordable one). A total of 44%-62% of households would need some degree of benefit support to be able to afford their housing (regardless of the tenure).

Table 8.23 Estimated need for affordable rented housing (% of households able to afford)

	Afford affordable rent	Afford social rent	Need benefit support	All unable to afford market
Coventry	32%	21%	46%	100%
North Warwks	26%	19%	55%	100%
N & B	19%	20%	62%	100%
Rugby	27%	24%	49%	100%
SoA	29%	27%	44%	100%
Warwick	26%	28%	45%	100%
Warwickshire	25%	25%	50%	100%
C & W	28%	23%	49%	100%

Source: Affordability analysis

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- 8.76 The finding that only 19%-32% of households can afford an affordable rent does not automatically lead to a policy conclusion on the split between the two types of housing. For example, many households who will need to access rented accommodation will be benefit dependent and as such could technically afford an affordable rent – hence a higher proportion of affordable rented housing might be appropriate – indeed the analysis does identify a substantial proportion of households as being likely to need benefit support. On the flip side, providing more social rents might enable households to return to work more easily, as a lower income would potentially be needed to afford the lower social (rather than affordable) rent.
- 8.77 There will be a series of other considerations both at a strategic level and for specific schemes. For example, there may be funding streams that are only available for a particular type of housing, and this may exist independently to any local assessment of need. Additionally, there will be the consideration of the balance between the cost of housing and the amount that can be viably provided, for example, it is likely that affordable rented housing is more viable, and therefore a greater number of units could be provided. Finally, in considering a split between social and affordable rented housing it needs to be considered that having different tenures on the same site (at least at initial occupation) may be difficult – e.g. if tenants are paying a different rent for essentially the same size/type of property and services. These are issues for the Councils to consider in formulating policies for affordable housing as part of individual local plans.
- 8.78 The evidence indicates that around 20-30% of the rented need identified should theoretically be met through provision of social rented homes; but there are wider considerations to be taken into account in determining policies for new-build development, including individual council's priorities, what rents are charged for existing stock and viability considerations.

Establishing a Need for Affordable Home Ownership

- 8.79 The Planning Practice Guidance confirms a widening definition of those to be considered as in affordable need; now including 'households which can afford to rent in the private rental market, but cannot afford to buy despite a preference for owning their own home'. However, at the time of writing, there is no guidance about how the number of such households should be measured.
- 8.80 The methodology used in this report therefore draws on the current methodology, and includes an assessment of current needs, and projected need (newly forming and existing households). The key difference is that in looking at affordability an estimate of the number of households in the 'gap' between buying and renting is used. There is also the issue of establishing an estimate of the supply of affordable home ownership homes – this is considered separately below.
- 8.81 The analysis has been developed in the context of First Homes with the Government proposing that

25% of all affordable housing secured through developer contributions should be within this tenure. A definition of First Homes (from the relevant PPG (70-001)) can be found later in this document.

Gross Need for Affordable Home Ownership

- 8.82 The first part of the analysis seeks to understand what the gap between renting and buying actually means in the study area – in particular establishing the typical incomes that might be required. The information about incomes required to both buy and rent in different locations has already been provided earlier in this section and so the discussion below is a broad example.
- 8.83 Using the income distributions developed (as set out earlier in this section) along with data about price and rents, it has been estimated that of all households living in the private rented sector, around 41% already have sufficient income to buy a lower quartile home, with 18% falling in the rent/buy 'gap'. The final 41% are estimated to have an income below which they cannot afford to rent privately (i.e. would need to spend more than the calculated threshold of their income on housing costs) although in reality it should be noted that many households will spend a higher proportion of their income on housing. These figures have been based on an assumption that incomes in the private rented sector are around 88% of the equivalent figure for all households (a proportion derived from the English Housing Survey) and are used as it is clear that affordable home ownership products are likely to be targeted at households living in or who might be expected to access this sector (e.g. newly forming households).
- 8.84 The table below shows an estimate of the proportion of households living in the private rented sector who are able to afford different housing products by local authority. This shows a higher proportion of households in the rent/buy gap in Stratford-on-Avon and Warwick. Lower figures can be seen in Coventry and Nuneaton & Bedworth.

Table 8.24 Estimated proportion of households living in Private Rented Sector able to buy and/or rent market housing – Coventry & Warwickshire

	Can afford to buy OR rent	Can afford to rent but not buy	Cannot afford to buy OR rent
Coventry	40%	12%	48%
North Warwickshire	47%	18%	35%
Nuneaton & Bedworth	48%	14%	39%
Rugby	44%	20%	36%
Stratford-on-Avon	36%	27%	37%
Warwick	36%	26%	39%
C & W	41%	18%	41%

Source: Derived from Housing Market Cost Analysis and Affordability Testing

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- 8.85 The finding that a significant proportion of households in the private rented sector are likely to have an income that would allow them to buy a home is also noteworthy and suggests that for many households, barriers to accessing owner-occupation are less about income/the cost of housing and more about other factors (which could for example include the lack of a deposit or difficulties obtaining a mortgage (for example due to a poor credit rating or insecure employment)). However, some households will choose to privately rent, for example as it is a more flexible option that may be more suitable for a particular household's life stage (e.g. if moving locations with employment).
- 8.86 To study current need, an estimate of the number of household living in the Private Rented Sector (PRS) has been established, with the same (rent/buy gap) affordability test (as described above) then applied. The start point is the number of households living in private rented accommodation; as of the 2011 Census there were some 59,100 households living in the sector across the study area. Data from the English Housing Survey (EHS) suggests that since 2011, the number of households in the PRS has risen by about 19% - if the same proportion is relevant to Coventry & Warwickshire then the number of households in the sector would now be around 70,300.
- 8.87 Additional data from the EHS suggests that 60% of all PRS households expect to become an owner at some point (42,200 households if applied to C & W) and of these some 40% (16,900 households) would expect this to happen in the next 2-years. These figures are taken as the number of households potentially with a current need for affordable home ownership before any affordability testing.
- 8.88 As noted above, on the basis of income it is estimated that around 12%-27% of the private rented sector sit in the gap between renting and buying (depending on location). Applying this proportion to the above figures would suggest a current need for around 2,900 affordable home ownership units (295 per annum if annualised over a 10-year period).
- 8.89 In projecting forward, the analysis can consider newly forming households and also the remaining existing households who expect to become owners further into the future. Applying the same affordability test (albeit on a very slightly different income assumption for newly forming households) suggests an annual need from these two groups of around 1,931 dwellings (1,489 from newly forming households and 442 from existing households in the private rented sector).
- 8.90 Bringing together the above analysis suggests that there is a need for around 2,226 affordable home ownership homes (priced for households able to afford to rent but not buy) per annum across the study area. This is before any assessment of the potential supply of housing is considered.

Table 8.25 Estimated Gross Need for Affordable Home Ownership by local authority (per annum) – Coventry & Warwickshire

	Current need	Newly forming households	Existing households falling into need	Total Gross Need
Coventry	92	403	138	633
North Warwks	15	82	23	120
N & B	26	148	40	214
Rugby	33	213	50	296
SoA	51	282	77	410
Warwick	77	361	115	553
Warwickshire	203	1,086	304	1,593
C & W	295	1,489	442	2,226

Source: Range of sources

Potential Supply of Housing to Meet the Affordable Home Ownership Need and Net Need

- 8.91 As with the need for social/affordable rented housing, it is also necessary to consider if there is any supply of affordable home ownership products from the existing stock of housing. As with assessing the need for affordable home ownership, it is the case that at present the PPG does not include any suggestions about how the supply of housing to meet these needs should be calculated.
- 8.92 One source is likely to be resales of low cost home ownership products with data from the Regulator of Social Housing showing a total stock in 2021 of 3,948 homes. If these homes were to turnover at the same rate seen for the social housing stock then they would be expected to generate around 140 resales each year. These properties would be available for these households and can be included as the potential supply.
- 8.93 In addition, it should be noted that the analysis looks at households unable to afford a lower quartile property price. By definition, a quarter of all homes sold will be priced at or below a lower quartile level. According to the Land Registry, in Coventry-Warwickshire there were a total of 11,817 resales (i.e. excluding newly-built homes) in the last year (year to March 2022) and therefore around 2,954 would be priced below the lower quartile. This is 2,954 homes that would potentially be affordable to the target group for affordable home ownership products and is a potential supply that is well in excess of the level of need calculated.
- 8.94 It is then possible to provide a best estimate of the supply of lower quartile homes that are bought by the target group of households (assumed to be first-time buyers). Whilst dated, a report by Bramley and Wilcox in 2010 (Evaluating requirements for market and affordable housing) noted that around

40% of first-time buyers with a mortgage buy at or below the lower quartile²¹. Other recent data suggests that first time buyers account for around half of home purchase loans²² with a total of around 65% of all homes being bought with a loan (35% as cash buyers²³).

8.95 Bringing this together would point to 32.5% of homes being bought by first-time buyers and around 13% of all homes being a lower quartile home bought by a first-time buyer (32.5% * 40%) – this would point to around half of all lower quartile sales as being to first-time buyers (as half of 25% is 12.5%). Therefore, for the purposes of estimating a ‘need’, half of all lower quartile sales are included in the supply.

8.96 We can therefore now provide three supply estimates which can be considered in the context of the estimated need. These are:

- Only count the supply from affordable home ownership resales (140 per annum);
- Include the supply from affordable home ownership and half of resales of lower quartile homes (1,617 per annum (1,477+140)); and
- Include the supply from affordable home ownership and all resales of lower quartile homes (3,095 per annum (2,955+140)).

8.97 The table below shows the estimated net need from applying these three supply scenarios. Only including the resales of AHO shows a need for 2,086 dwellings per annum and this reduces to a need for 609 per annum if 50% of lower quartile sales are included. If all lower quartile sales are included in the supply, then there is a substantial surplus of affordable home ownership shown. Overall, the analysis shows it is difficult to conclude what the need for affordable home ownership is (and indeed if there is one).

²¹ https://thinkhouse.org.uk/site/assets/files/1614/2010_20nhpau_202.pdf

²² <https://www.mortgagesolutions.co.uk/news/2022/01/24/first-time-buyer-numbers-rose-to-nearly-410000-in-2021/#:~:text=First%2Dtime%20buyers%20accounted%20for,39%20per%20cent%20in%202009>

²³ <https://www.ft.com/content/e0ad2830-094f-4e61-aaa-d77457e2edbb>

Table 8.26 Estimated Need for Affordable Home Ownership (per annum)

	AHO resales only	AHO resales plus 50% of LQ sales	AHO resales plus 100% of LQ sales
Total gross need	2,226	2,226	2,226
LCHO supply	140	1,617	3,095
Net need	2,086	609	-869

Source: Range of sources

- 8.98 Focussing on the middle of the three scenarios above (50% of lower quartile sales) the table below shows a need for affordable home ownership in all areas apart from Nuneaton & Bedworth (where the analysis suggests a broad balance between need and supply). It should be noted that the areas where the need for AHO is highest (notably Warwick and Stratford-on-Avon) also show a high need for rented affordable housing. Given the earnings and house price profile this is logical. Icen consider that this 'middle scenario' should be used in drawing conclusions.

Table 8.27 Estimated Need for Affordable Home Ownership by sub-area (per annum)

	Total Gross Need	Supply	Net need
Coventry	633	484	149
North Warwickshire	120	118	2
Nuneaton & Bedworth	214	230	-16
Rugby	296	208	88
Stratford-on-Avon	410	281	129
Warwick	553	296	258
Warwickshire	1,593	1,133	460
Coventry-Warwickshire	2,226	1,617	609

Source: Range of sources as discussed

Implications of the Analysis

- 8.99 Given the analysis above, it would be reasonable to conclude that there is a need to provide housing under the definition of 'affordable home ownership' – although this conclusion is based on only considering supply from resales of low cost home ownership and some resales of existing homes in the market. If supply estimates are expanded to include all market housing for sale below a lower quartile price then the need for AHO is less clear-cut.
- 8.100 Regardless, it does seem that there are many households in Coventry & Warwickshire who are being excluded from the owner-occupied sector. This can be seen by analysis of tenure change, which saw the number of households living in private rented accommodation increasing by 101% from 2001 to 2011 (with the likelihood that there have been further increases since). Over the same period, the number of owners with a mortgage dropped by 11%. That said, some households will choose to

privately rent, for example as it is a more flexible option that may be more suitable for a particular household's life stage (e.g. if moving locations with employment).

Table 8.28 Change in number of owner-occupiers with a mortgage and number of households in the private rented sector (2001-11)

	Owners with a mortgage				Private rented			
	2001	2011	Change	% change	2001	2011	Change	% change
Coventry	46,687	40,236	-6,451	-13.8%	12,429	26,503	14,074	113.2%
N Warwks	11,150	9,679	-1,471	-13.2%	1,779	2,913	1,134	63.7%
N & B	22,347	20,072	-2,275	-10.2%	2,808	6,683	3,875	138.0%
Rugby	16,077	15,314	-763	-4.7%	2,511	5,903	3,392	135.1%
SoA	18,913	16,989	-1,924	-10.2%	4,264	6,596	2,332	54.7%
Warwick	22,215	19,954	-2,261	-10.2%	5,599	10,513	4,914	87.8%
Warwickshire	90,702	82,008	-8,694	-9.6%	16,961	32,608	15,647	92.3%
C & W	137,389	122,244	-15,145	-11.0%	29,390	59,111	29,721	101.1%

Source: Census (2001 and 2011)

- 8.101 On this basis, and as previously noted, it seems likely in Coventry & Warwickshire that access to owner-occupation is being restricted by access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially some mortgage restrictions (e.g. where employment is temporary) rather than just being due to the cost of housing to buy.
- 8.102 The NPPF gives a clear direction that 10% of all new housing (on larger sites) should be for affordable home ownership (in other words, if 20% of homes were to be affordable then half would be affordable home ownership) and it is now the case that policy-compliant planning applications would be expected to deliver a minimum of 25% affordable housing as First Homes (as a proportion of the total affordable housing), with Councils being able to specify the requirement for any remaining affordable housing (subject to at least 10% of all housing being for AHO).
- 8.103 Whilst there are clearly many households in the gap between renting and buying, they in some cases will be able to afford homes below lower quartile housing costs. That said, it is important to recognise that some households will have insufficient savings to be able to afford to buy a home on the open market (particularly in terms of the ability to afford a deposit) and low-cost home ownership homes – and shared ownership homes in particular – will therefore continue to play a role in supporting some households in this respect.
- 8.104 The evidence points to a clear and acute need for rented affordable housing for lower income households, and it is important that a supply of rented affordable housing is maintained to meet the needs of this group including those to which the authorities have a statutory housing duty. Such housing is notably cheaper than that available in the open market and can be accessed by many

more households (some of whom may be supported by benefit payments).

- 8.105 There will also be a role for AHO on any 100% affordable housing schemes that may come forward (as well as through Section 106). Including a mix of both rented and intermediate homes to buy would make such schemes more viable, as well as enabling a range of tenures and therefore potential client groups to access housing.
- 8.106 In addition, it should also be noted that the finding of a 'need' for affordable home ownership does not have any impact on the overall need for housing. It seems clear that this group of households is simply a case of seeking to move households from one tenure to another (in this case from private renting to owner-occupation); there is therefore no net change in the total number of households, or the number of homes required.

How Much Should Affordable Home Ownership Homes Cost?

- 8.107 The analysis and discussion above suggest that there are a number of households likely to fall under the PPG definition of needing affordable home ownership (including First Homes) – i.e. in the gap between renting and buying – but that the potential supply of low-cost housing to buy makes it difficult to fully quantify this need. However, given the NPPF, the Councils are likely to need to consider some additional homes on larger sites as some form of affordable home ownership (AHO).
- 8.108 The analysis below focusses on the cost of discounted market sale (which would include First Homes) to make them genuinely affordable before moving on to consider shared ownership (in this case suggestions are made about the equity shares likely to be affordable and whether these shares are likely to be offered). It is considered that First Homes and shared ownership are likely to be the main affordable home ownership tenures moving forward although it is accepted that some delivery may be of other products. This section also provides some comments about Rent to Buy housing.
- 8.109 The reason for the analysis to follow is that it will be important for the Councils to ensure that any affordable home ownership is sold at a price that is genuinely affordable for the intended target group – for example there is no point in discounting a new market home by 30% if the price still remains above that for which a reasonable home can already be bought in the open market.

Discounted Market Sales Housing (focussing on First Homes)

- 8.110 In May 2021, MHCLG published a new Planning Practice Guidance (PPG) regarding First Homes. The key parts of this guidance are set out below:

First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of 'affordable housing' for planning purposes. Specifically, First Homes are discounted market sale units which:

- a) must be discounted by a minimum of 30% against the market value;*
- b) are sold to a person or persons meeting the First Homes eligibility criteria (see below);*
- c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,*
- d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).*

First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

- 8.111 In terms of eligibility criteria, a purchaser should be a first-time buyer with a combined annual household income not exceeding £80,000 (or £90,000 in Greater London) and a mortgage needs to fund a minimum of 50% of the discounted purchase price. Local authorities can set their own eligibility criteria, which could for example involve lower income caps, a local connection test, or criteria based on employment status. Regarding discounts, a First Home must be sold at least 30% below the open market value. However, local authorities do have the discretion to require a higher minimum discount of either 40% or 50% (if they can demonstrate a need for this).
- 8.112 As noted above, the problem with having a percentage discount is that it is possible in some locations or types of property that such a discount still means that the discounted housing is more expensive than that typically available in the open market. This is often the case as new build housing itself attracts a premium. The preferred approach in this report is to set out a series of purchase costs for different sizes of accommodation which ensure these products are affordable for the intended group. These purchase costs are based on current lower quartile rental prices and also consideration of the income required to access the private rented sector and then estimating what property price this level of income might support (assuming a 10% deposit and a 4.5 times mortgage multiple). Below is an example of a calculation based on a 2-bedroom home in Coventry:
- Previous analysis has shown that the lower quartile rent for a 2-bedroom home in Coventry is £650 per month;
 - On the basis of a household spending no more than 30% of their income on housing, a household would need an income of around £2,170 per month to afford (£650/0.30) or £26,000 per annum; and

-
- With an income of £26,000, it is estimated that a household could afford to buy a home for around £130,000. This is based on assuming a 10% deposit (mortgage for 90% of value) and a four and a half times mortgage multiple – calculated as $£26,000 \times 4.5 / 0.9$.

8.113 Therefore, £130,000 is a suggested purchase price to make First Homes/discounted home ownership affordable for households in the rent/buy gap in Coventry. This figure is essentially the equivalent price that is affordable to a household who can just afford to rent privately. In reality, there will be a range of incomes in the rent/buy gap and so some households could afford a higher price; however, setting all homes at a higher price would mean that some households will still be unable to afford.

8.114 On this basis, it is considered reasonable to look at the cost of First Homes as a range, from the equivalent private rent figure up to a midpoint of the cost of open market purchase and the relevant private rented figure (for a 2-bedroom home the lower quartile price is this is £140,000, giving a midpoint of £135,000). The use of a midpoint would mean that only around half of households in the rent/buy gap could afford, and therefore any housing provided at such a cost would need to also be supplemented by an equivalent number at a lower cost (which might include other tenures such as shared ownership).

8.115 The tables below therefore set out a suggested purchase price for affordable home ownership/First Homes in each area. The tables also show an estimated OMV and the level of discount likely to be required to achieve affordability. The OMV is based on taking the estimated lower quartile price by size and adding 15% (which is the typically newbuild premium seen nationally). It should be noted that the discounts are based on the OMV as estimated, in reality the OMV might be quite different for specific schemes and therefore the percentage discount would not be applicable. For example, if the OMV for a 2-bedroom home in Coventry were to actually be £200,000 (rather than the modelled £161,000) then the discount would be in the range of 33% and 35%.

8.116 On the basis of the specific assumptions used, the analysis points to a discount of around 30% for 2-bedroom homes and a figure of around 40% for larger (3+-bedroom) properties. Given that a single discount figure is likely to be needed for plan making purposes it is suggested that a 30% discount is reasonable, with the expectation that most First Homes will particularly be 2-bedroom properties. Given there is a cap of £250,000 on the purchase price, it seems unlikely that 4+-bedroom homes could be provided as First Homes in some locations (notably Stratford-on-Avon and Warwick).

Table 8.29 Affordable home ownership prices – data for year to March 2022 – Coventry

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£102,500	£111,550	8%
2-bedrooms	£130,000-£135,000	£161,000	16%-19%
3-bedrooms	£150,000-£176,000	£232,300	24%-35%
4+-bedrooms	£200,000-£232,000	£303,600	24%-34%

Source: Derived from a range of sources

Table 8.30 Affordable home ownership prices – data for year to March 2022 – North Warwickshire

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	-	-	-
2-bedrooms	£120,000-£130,500	£162,150	20%-26%
3-bedrooms	£139,000-£167,500	£225,400	26%-38%
4+-bedrooms	£190,000-£249,500	£355,350	30%-47%

Source: Derived from a range of sources

Table 8.31 Affordable home ownership prices – data for year to March 2022 – Nuneaton & Bedworth

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£90,000-£93,500	£111,550	16%-19%
2-bedrooms	£115,000-£122,500	£149,500	18%-23%
3-bedrooms	£130,000-£159,500	£217,350	27%-40%
4+-bedrooms	£179,000-£233,000	£330,050	29%-46%

Source: Derived from a range of sources

Table 8.32 Affordable home ownership prices – data for year to March 2022 – Rugby

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£110,000-£113,000	£133,400	15%-18%
2-bedrooms	£132,000-£141,000	£172,500	18%-23%
3-bedrooms	£159,000-£198,000	£272,550	27%-42%
4+-bedrooms	£211,000-£292,000	£428,950	32%-51%

Source: Derived from a range of sources

Table 8.33 Affordable home ownership prices – data for year to March 2022 – Stratford-on-Avon

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£125,000-£134,500	£165,600	19%-25%
2-bedrooms	£149,000-£175,000	£231,150	24%-36%
3-bedrooms	£179,000-£228,000	£318,550	28%-44%
4+-bedrooms	£240,000-£336,000	£496,800	32%-52%

Source: Derived from a range of sources

Table 8.34 Affordable home ownership prices – data for year to March 2022 – Warwick

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£130,000-£140,000	£172,500	19%-25%
2-bedrooms	£157,000-£180,500	£234,600	23%-33%
3-bedrooms	£185,000-£240,500	£340,400	29%-46%
4+-bedrooms	£250,000-£344,000	£503,700	32%-50%

Source: Derived from a range of sources

Shared Ownership

- 8.117 Whilst the Government has a clear focus on First Homes, they also see a continued role for Shared Ownership, launching a 'New Model for Shared Ownership' in early 2021 (following a 2020 consultation) – this includes a number of proposals, with the main one for the purposes of this assessment being the reduction of the minimum initial share from 25% to 10%. A key advantage of shared ownership over other tenures is that a lower deposit is likely to be required than for full or discounted purchase. Additionally, the rental part of the cost will be subsidised by a Registered Provider and therefore keeps monthly outgoings down.
- 8.118 For the purposes of the analysis in this report it is considered that for shared ownership to be affordable, total outgoings should not exceed that needed to rent privately.
- 8.119 Because shared ownership is based on buying part of a property, it is the case that the sale will need to be at open market value. Where there is a large gap between the typical incomes required to buy or rent, it may be the case that lower equity shares are needed for homes to be affordable (at the level of renting privately). The analysis below therefore seeks to estimate the typical equity share that might be affordable for different sizes of property with any share lower than 10% likely to be unavailable. The key assumptions used in the analysis are:
- OMV at LQ price plus 15% (reflecting likelihood that newbuild homes will have a premium attached and that they may well be priced above a LQ level) – it should be noted that this is

an assumption for modelling purposes and consideration will need to be given to the OMV of any specific product;

- 10% deposit on the equity share;
- Rent at 2.75% pa on unsold equity;
- Repayment mortgage over 25-years at 4%;
- Service charge of £100 per month for flatted development (assumed to be 1- and 2-bedroom homes); and
- It is also assumed that shared ownership would be priced for households sitting towards the bottom end of the rent/buy gap and so the calculations assume that total outgoings should be no higher than the equivalent private rent (lower quartile) cost for that size of property.

8.120 The tables below show that to make shared ownership affordable, equity shares in the region of 35%-50% could work for some sizes of home in some locations, however, much lower shares are likely to be needed to make homes affordable for most dwelling sizes/locations. Overall, it is suggested that equity shares in the range of 20%-35% should be considered but that it will be important to make sure the actual cost to the household is genuinely affordable in a local context.

8.121 It should also be noted that the analysis below is predicated on a particular set of assumptions (notably about likely OMV). In reality costs do vary across the area and will vary from site to site. Therefore, this analysis should be seen as indicative with specific schemes being tested individually to determine if the product being offered is genuinely (or reasonably) affordable.

Table 8.35 Estimated Affordable Equity Share by Size – Coventry

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£111,550	£161,000	£232,300	£303,600
Share	67%	46%	38%	41%
Equity Bought	£74,739	£73,738	£88,274	£123,565
Mortgage Needed	£67,265	£66,364	£79,447	£111,209
Monthly Cost of Mortgage	£355	£350	£419	£587
Retained Equity	£36,812	£87,262	£144,026	£180,035
Monthly Rent on Retained Equity	£84	£200	£330	£413
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£540	£650	£750	£1,000

Source: Data based on Housing Market Cost Analysis

Table 8.36 Estimated Affordable Equity Share by Size – North Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	-	£162,150	£225,400	£355,350
Share	-	32%	32%	16%
Equity Bought	-	£52,212	£72,579	£55,257
Mortgage Needed	-	£46,991	£65,321	£49,731
Monthly Cost of Mortgage	-	£248	£345	£263
Retained Equity	-	£109,938	£152,821	£300,093
Monthly Rent on Retained Equity	-	£252	£350	£688
Service Charge per month	-	£100	£0	£0
Total Cost per month	-	£600	£695	£950

Source: Data based on Housing Market Cost Analysis

Table 8.37 Estimated Affordable Equity Share by Size – Nuneaton & Bedworth

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£111,550	£149,500	£217,350	£330,050
Share	34%	36%	28%	17%
Equity Bought	£38,262	£53,820	£61,727	£56,439
Mortgage Needed	£34,435	£48,438	£55,555	£50,795
Monthly Cost of Mortgage	£182	£256	£293	£268
Retained Equity	£73,288	£95,680	£155,623	£273,611
Monthly Rent on Retained Equity	£168	£219	£357	£627
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£450	£575	£650	£895

Source: Data based on Housing Market Cost Analysis

Table 8.38 Estimated Affordable Equity Share by Size – Rugby

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£133,400	£172,500	£272,550	£428,950
Share	44%	39%	25%	7%
Equity Bought	£58,696	£66,930	£69,228	£29,169
Mortgage Needed	£52,826	£60,237	£62,305	£26,252
Monthly Cost of Mortgage	£279	£318	£329	£139
Retained Equity	£74,704	£105,570	£203,322	£399,781
Monthly Rent on Retained Equity	£171	£242	£466	£916
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£550	£660	£795	£1,055

Source: Data based on Housing Market Cost Analysis

Table 8.39 Estimated Affordable Equity Share by Size – Stratford-on-Avon

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£165,600	£231,150	£318,550	£496,800
Share	36%	20%	21%	5%
Equity Bought	£58,954	£46,923	£66,896	£24,840
Mortgage Needed	£53,058	£42,231	£60,206	£22,356
Monthly Cost of Mortgage	£280	£223	£318	£118
Retained Equity	£106,646	£184,227	£251,655	£471,960
Monthly Rent on Retained Equity	£244	£422	£577	£1,082
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£625	£745	£895	£1,200

Source: Data based on Housing Market Cost Analysis

Table 8.40 Estimated Affordable Equity Share by Size – Warwick

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£172,500	£234,600	£340,400	£503,700
Share	36%	26%	17%	8%
Equity Bought	£62,790	£60,058	£58,889	£38,785
Mortgage Needed	£56,511	£54,052	£53,000	£34,906
Monthly Cost of Mortgage	£298	£285	£280	£184
Retained Equity	£109,710	£174,542	£281,511	£464,915
Monthly Rent on Retained Equity	£251	£400	£645	£1,065
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£650	£785	£925	£1,250

Source: Data based on Housing Market Cost Analysis

- 8.122 In policy terms, whilst the analysis has provided an indication of the equity shares possibly required by size, the key figure is actually the total cost per month (and how this compares with the costs to access private rented housing). For example, whilst the tables suggest a 50% equity share for 2-bedroom home in Coventry, this is based on a specific set of assumptions. Were a scheme to come forward with a 25% share, but a total cost in excess of £650 per month, then it would be clear that a lower share is likely to be required to make the home genuinely affordable. Hence the actual share can only be calculated on a scheme-by-scheme basis. Any policy position should seek to ensure that outgoings are no more than can reasonably be achieved in the private rented sector, rather than seeking a specific equity share.

Rent to Buy

- 8.123 A further affordable option is Rent to Buy; this is a government scheme designed to ease the transition from renting to buying the same home. Initially (typically five years) the newly built home will be provided at the equivalent of an affordable rent (approximately 20% below the market rate).

The expectation is that the discount provided in that first five years is saved in order to put towards a deposit on the purchase of the same property. Rent to Buy can be advantageous for some households as it allows for a smaller 'step' to be taken on to the home ownership ladder.

8.124 At the end of the five-year period, depending on the scheme, the property is either sold as a shared ownership product or to be purchased outright as a full market property. If the occupant is not able to do either of these then the property is vacated.

8.125 In order to access this tenure it effectively requires the same income threshold for the initial phase as a market rental property although the cost of accommodation will be that of affordable rent. The lower than market rent will allow the household to save for a deposit for the eventual shared ownership or market property. In considering the affordability of rent-to-buy schemes there is a direct read across to the income required to access affordable home ownership (including shared ownership), it should therefore be treated as part of the affordable home ownership products suggested by the NPPF.

Essential Local Workers

8.126 Annex 2 of the NPPF also includes the needs of essential local workers 'Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provided a subsidised route to home ownership and/or is for essential local workers' [emphasis added]. Essential local workers are defined as 'Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers'.

8.127 To give an indication of the number of essential workers in Coventry & Warwickshire analysis has been undertaken looking at Standard Industrial Classification 2007 (SIC) categories – this shows employment sectors based on industry, and for the purposes of this analysis the public administration, education and health industries have been used to represent 'essential workers'. The analysis shows that around 29% of resident workers are considered 'essential workers' in Coventry, with a slightly lower figure of 26% in Warwickshire – these figures are similar to those seen regionally and nationally (both at 28%).

Table 8.41 Number and proportion of essential workers in a range of areas

	Coventry		Warwickshire		West Midlands	England
	Resident workers	% of workers	Resident workers	% of workers	% of workers	% of workers
Agriculture, energy and water	2,494	1.8%	7,788	2.8%	2.6%	2.3%
Manufacturing	15,971	11.6%	31,899	11.6%	12.3%	8.9%
Construction	7,478	5.4%	18,279	6.7%	7.5%	7.7%
Distribution, hotels and restaurants	31,953	23.1%	61,104	22.3%	22.3%	21.5%
Transport and communication	13,483	9.8%	26,813	9.8%	8.1%	9.1%
Financial, Real Estate, Professional & Administration	20,383	14.8%	43,300	15.8%	14.3%	17.5%
Public administration, education and health	40,056	29.0%	71,524	26.1%	28.4%	28.2%
Other	6,324	4.6%	13,289	4.9%	4.5%	5.0%
All industries	138,142	100.0%	273,996	100.0%	100.0%	100.0%

Source: 2011 Census

8.128 The table below shows how the number of essential workers varies across local authorities. Generally, the authorities have similar proportions of essential workers, with the main notable differences being a slightly lower proportion in North Warwickshire and Stratford-on-Avon.

Table 8.42 Number and proportion of essential workers – local authorities

	Resident essential workers	% of workers in area	% of resident workers
Coventry	40,056	29.0%	35.9%
North Warwickshire	7,378	23.5%	6.6%
Nuneaton & Bedworth	16,082	26.6%	14.4%
Rugby	13,239	26.1%	11.9%
Stratford-on-Avon	14,321	23.3%	12.8%
Warwick	20,504	29.3%	18.4%
Warwickshire	71,524	26.1%	64.1%
C & W	111,580	27.1%	100.0%

Source: 2011 Census

8.129 The 2011 Census also enables analysis to be conducted as to the tenure of workers by industry. It can be seen that essential workers see a fairly average profile, with similar levels of owner-occupation, social renting and private renting as is seen across each individual authority (Coventry and Warwickshire).

Table 8.43 Housing tenure by industry of employment (2011) – Coventry

	Owner-occupied	Social rented	Private rented
Agriculture, energy and water	70%	8%	22%
Manufacturing	77%	7%	16%
Construction	76%	8%	16%
Distribution, hotels and restaurants	57%	14%	29%
Transport and communication	66%	10%	24%
Financial, Real Estate, Professional and Administration	67%	10%	23%
Public administration, education and health	68%	11%	21%
Other	57%	13%	30%
All industries	67%	11%	23%

Source: 2011 Census

Table 8.44 Housing tenure by industry of employment (2011) – Warwickshire

	Owner-occupied	Social rented	Private rented
Agriculture, energy and water	74%	8%	18%
Manufacturing	80%	7%	13%
Construction	78%	8%	14%
Distribution, hotels and restaurants	65%	13%	22%
Transport and communication	72%	8%	20%
Financial, Real Estate, Professional and Administration	76%	6%	17%
Public administration, education and health	74%	9%	17%
Other	64%	10%	26%
All industries	73%	9%	18%

Source: 2011 Census

- 8.130 It is also possible to consider the affordability of housing for essential workers by considering local salaries. An online assessment of local jobs (across Coventry & Warwickshire) for nurses, firefighters, teachers, police officers and childcare was undertaken in August 2022. This showed a range of salaries, but typically in the range of about £20,000 to £30,000 per annum. The average salary was around £25,000 although it does need to be noted that there are a variety of roles with a range of salaries in these professions depending on level of expertise and experience.
- 8.131 With a salary of £25,000, an individual might be able to buy a home for around £125,000 (based on a 10% deposit and 4.5 times mortgage multiple) and with two salaries at this level would be able to afford around £250,000. This latter figure would allow the household to afford to buy a home across much of the study area, but the single income would make home ownership difficult (particularly in higher value locations), and this population could be a potential target for affordable home ownership products.

8.132 Overall, the analysis does not point towards there being a particular and specific need for affordable housing for essential workers. Such workers make up a similar part of the workforce as is the case in many areas and households are as likely to be owner-occupiers than many other industry groups. However, on the basis of local incomes (notably for single income essential workers), access to the owner-occupied sector may be restricted by income and it may be appropriate to consider whether or not some affordable properties should be set aside for essential local workers.

Summary of Affordable Housing Need

8.133 The table below brings together the estimates of annual need for rented affordable housing and affordable home ownership to consider the balance between tenures in different areas. This table should be considered for reference purposes and will not directly inform decisions about an appropriate mix for any individual area – that will in part be informed by viability and also any local priorities such as to maximise provision of rented accommodation as that is likely to be required by households with the most acute needs.

8.134 When looking at rented needs, the analysis suggests a need for 3,833 affordable homes per annum across the whole study area, with a need shown for all individual local authorities; the Councils are therefore justified in seeking to secure additional affordable housing.

Table 8.45 Estimated annual need for affordable housing split between rented and affordable home ownership – Coventry & Warwickshire

	Rented affordable need	Affordable home ownership need	Total annual need	% as AHO
Coventry	1,887	149	2,035	7%
North Warwks	131	2	133	1%
N & B	407	-16	391	-4%
Rugby	407	88	495	18%
SoA	419	129	547	24%
Warwick	582	258	839	31%
Warwickshire	1,946	460	2,406	19%
C & W	3,833	609	4,441	14%

Source: Draws from earlier analysis

8.135 The analysis suggests that there will be a need for both social and affordable rented housing – the latter will be suitable particularly for households who are close to being able to afford to rent privately and also for some households who claim full Housing Benefit. It is for individual Councils to consider the balance of provision between social and affordable rented homes sought through new developments which needs to be informed by the needs evidence alongside relative Council priorities and viability evidence.

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- 8.136 When looking at the need for AHO products, the analysis also suggests a need across the study area, albeit (at 609 per annum) the need is lower than for rented housing. In interpreting this figure, it should however be noted that there could be additional supply from resales of market homes (below a lower quartile price) which arguably would mean there is a much more limited need for AHO.
- 8.137 Analysis does suggest that there are many households in Coventry & Warwickshire who are being excluded from the owner-occupied sector (as evidenced by reductions in owners with a mortgage and increases in the size of the private rented sector). This suggests that a key issue in the study area is about access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially mortgage restrictions (e.g. where employment is temporary) rather than simply the cost of housing to buy.
- 8.138 The study also considers different types of AHO (notably First Homes and shared ownership) as each will have a role to play – shared ownership is likely to be suitable for households with more marginal affordability (those only just able to afford to privately rent) as it has the advantage of a lower deposit and subsidised rent.
- 8.139 In deciding what types of affordable housing to provide, including a split between rented and home ownership products, the Councils will need to consider the relative levels of need and also viability issues (recognising for example that providing AHO may be more viable and may therefore allow more units to be delivered, but at the same time noting that households with a need for rented housing are likely to have more acute needs and fewer housing options).
- 8.140 Overall, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.

PART C: CONSIDERING EMPLOYMENT LAND NEEDS

9. EMPLOYMENT LAND NEEDS

9.1 This section moves on to consider the need for employment land across Coventry and Warwickshire looking to 2041 and 2050 (reflecting the different time periods for local plans under preparation in the sub-region)

National Planning Policy and Guidance

9.2 The NPPF sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and grow. It outlines that significant weight should be placed on the need to support economic growth and productivity (Para 81). Through the plan-making process, local planning authorities (LPAs) need to set out an economic vision and strategy which positively and proactively encourages sustainable economic growth having regard to Local Industrial Strategies and other policies for economic development and regeneration; and to set criteria for, or identify strategic sites, for local and inward investment (Para 82).

9.3 Para 83 in the NPPF states that planning policies and decisions should recognise and address the specific locational requirements of different sectors or clusters, including knowledge or data-driven sectors, create or high-tech industries, and for storage and distribution at a variety of scales and at suitably accessible locations. Para 85 recognises that in rural areas, sites to meet local business and community needs may be adjacent to or beyond existing settlements and in locations which are not well served by public transport.

9.4 Planning Practice Guidance (PPG) on *Housing and economic needs assessment* requires policy-making authorities to prepare (and keep under review) evidence to understand business needs and encourages such assessments to be undertaken across Functional Economic Market Areas (FEMA) which in this case relates to the Coventry and Warwickshire sub-region.

9.5 In assessing future needs, PPG Para 2a-027 outlines a number of different techniques:

- sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)
- demographically derived assessments of current and future local labour supply (labour supply techniques)
- analysis based on the past take-up of employment land and property and/or future property market requirements

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- consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.
- 9.6 Icení has had regard to these different approaches in preparing the HEDNA. Icení's approach has been to consider and triangulate different methodologies and evidence in drawing conclusions on future employment floorspace and land needs.
- 9.7 Different forecasting techniques have their advantages and disadvantages. Econometric forecasts take account of differences in expected economic performance moving forward relative to the past. However, a detailed model is required to relate net forecasts to use classes and estimate gross floorspace and land requirements.
- 9.8 For office-based sectors consideration needs to be given to the impacts of trends in home working (and growth in hybrid working whereby workers spend part of the working week at home). For industrial sectors however the relationship between floorspace needs and employment trends may be weak – influenced by productivity improvements. In contrast, past take-up is based on actual delivery of employment development; but does not take account of implications of growth in labour supply or housing growth nor any differences in economic performance relative to the past. It is also potentially influenced by past land supply and/or planning policies.
- 9.9 Ultimately therefore an appropriate approach is therefore to utilise a range of different forecasting techniques alongside local intelligence and an understanding of the merits of different approaches in drawing conclusions. This approach of triangulating different approaches and testing findings, which Icení adopts, is consistent with the PPG.
- 9.10 PPG Para 2a-031 specifically addresses how to assess need and allocate land for logistics. The logistics/ distribution sector is an important component of the sub-regional economy and the sub-region has a competitive advantage in this sector reflecting its location at the centre of the country and motorway network. Para 2a-031 outlines that:

“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to

appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.”

- 9.11 The PPG encourages analysis of market signals, including the take-up and availability of land; analysis of economic forecasts to identify potential changes in demand; and engagement – including with LEPs, logistics developers and occupiers in assessing demand. It is clear that LPAs will then need to consider the most appropriate locations for meeting identified needs (whether through the expansion of existing sites or development of new ones).
- 9.12 The need for strategic distribution and warehousing space are influenced by different factors, including the growth in e-retailing, traffic/ freight growth, the replacement of older warehousing space and economies of scale. A specific forecasting exercise is undertaken for large-scale B8 warehousing units (defined as over 9,000 sq.m / 100,000 s.qft). This has been undertaken by MDS Transmodal working alongside Iceni. It is a tried and tested forecasting approach which informed both the East and West Midlands RSS and has/ is being used in a number of adjoining sub-regional areas including Leicestershire, Nottinghamshire together with the Liverpool City Region.

Labour Demand Model

- 9.13 Using the employment forecasts from CE, Iceni has developed a set of employment floorspace requirements. They relate to the floorspace and land required to accommodate net growth in floorspace. Provision for flexibility of supply and replacement demand is considered later in this Paper.
- 9.14 CE provided a 45 sector breakdown of sectors which we have used to model floorspace needs. Iceni has a standard model which considers how sectors relate to use classes which is used to estimate the proportion of employment in different broad use classes – offices (Eg(i) and E(g)(ii)), industrial (E(g)(iii) and B2) and warehousing (B8). We attribute changes in jobs to use classes first, using BRES data to estimate the sector-specific relationship between net changes in total employment and that for Full-Time Equivalent (FTE) jobs.
- 9.15 A typical home working by sector rate has been applied to discount the needs rates by sector, using 2019 data. A sensitivity is considered using a higher home working rate in the future (as presented later in this section).

9.16 The next stage in the modelling is then to apply employment densities to estimate the net change in floorspace. Employment density assumptions are assumed in relating changes in FTE employment to floorspace.²⁴ These are as follows:

- 14 sqm offices (12 sq.m NIA per FTE)
- 44 sqm industrial (blend of former B1c and B2)
- 80 sqm warehousing

9.17 In the labour demand modelling, warehousing needs relate to both strategic and non-strategic warehousing, the former being 'big box' units of > 9,000 sq.m. The forecasts are trend-based and thus a concentration of forecast jobs growth in warehousing in North Warwickshire is a reflection of historical development patterns. Clearly future changes in the spatial distribution of development in this sector could influence future employment trends at a local level.

9.18 The table below sets out the FTEs by Use Class change 2021-41.

Table 9.1 FTEs – Net Change 2021-2041 by Use Class

	Offices	Industrial	Warehousing	Other
North Warwickshire	1,600	-400	1,100	4,800
Nuneaton and Bedworth	700	-500	300	3,600
Rugby	1,200	-400	700	4,800
Stratford-on-Avon	1,800	-900	200	7,500
Warwick	4,100	-700	500	6,100
Coventry	4,200	-1,000	900	12,000
Total	13,600	-3,900	3,800	38,800

Source: CE/ Icen

9.19 Using the density figures about the summary floorspace outputs for the authorities for 2021-41 are as follows:

Table 9.2 Labour Demand – Net Floorspace Needs 2021-2041, sqm

	Offices	Industrial	Warehousing
North Warwickshire	22,800	-16,100	90,600
Nuneaton and Bedworth	10,100	-22,000	23,300
Rugby	16,500	-17,400	58,800
Stratford-on-Avon	25,900	-41,800	17,200
Warwick	56,900	-29,400	41,200
Coventry	58,300	-44,500	71,200
Total	190,400	-171,200	302,300

²⁴ These relate to the Gross External Area ("GEA").

Source: CE/ Icen

9.20 The equivalent figures over the longer timeframe to 2050 are shown below:

Table 9.3 Labour Demand – Net Floorspace Needs 2021-50, sq.m

	Offices	Industrial	Warehousing
North Warwickshire	31,700	-29,000	126,100
Nuneaton and Bedworth	13,800	-30,900	31,000
Rugby	23,000	-27,200	81,300
Stratford-on-Avon	36,000	-77,000	22,300
Warwick	78,800	-42,100	55,800
Coventry	80,700	-83,500	95,500
Total	263,900	-289,700	411,900

Source: CE/ Icen

9.21 Office floorspace needs are focused (spatially) on Coventry and Warwick, which are the main office markets in the sub-region; followed by Stratford-on-Avon.

9.22 Industrial floorspace needs are negative in the labour demand model. Warehouse floorspace needs are focused on North Warwickshire, Coventry and Rugby in the centre/north of the sub-region.

9.23 Net floorspace need has been converted to land using standard plot ratios of:

- 0.5 for offices (rising to 1.5 for Coventry reflecting a blended plot ratio including some city centre higher density, such as Friargate and some at business park/ lower densities);
- 0.5 for industrial; and
- 0.4 for warehouse and distribution.

9.24 The plot ratios describe the relationship between the site size and floorspace. Land requirements relate to the net developable area, which will be lower than the total site area as some space is devoted to infrastructure, green space etc.

9.25 The initial outputs for the authorities are as follows:

Table 9.4 Labour Demand – Net Land Needs 2021-2041, ha

	Offices	Industrial	Warehousing
North Warwickshire	4.6	-3.2	22.7
Nuneaton and Bedworth	2.0	-4.4	5.8
Rugby	3.3	-3.5	14.7
Stratford-on-Avon	5.2	-8.4	4.3

Warwick	11.4	-5.9	10.3
Coventry	3.9	-8.9	17.8
Total	30.3	-34.2	75.6

Source: CE/ Icenl

Table 9.5 Labour Demand – Net Land Needs 2021-50, ha

	Offices	Industrial	Warehousing
North Warwickshire	6.3	-5.8	31.5
Nuneaton and Bedworth	2.8	-6.2	7.7
Rugby	4.6	-5.4	20.3
Stratford-on-Avon	7.2	-15.4	5.6
Warwick	15.8	-8.4	13.9
Coventry	5.4	-16.7	23.9
Total	42.0	-57.9	103.0

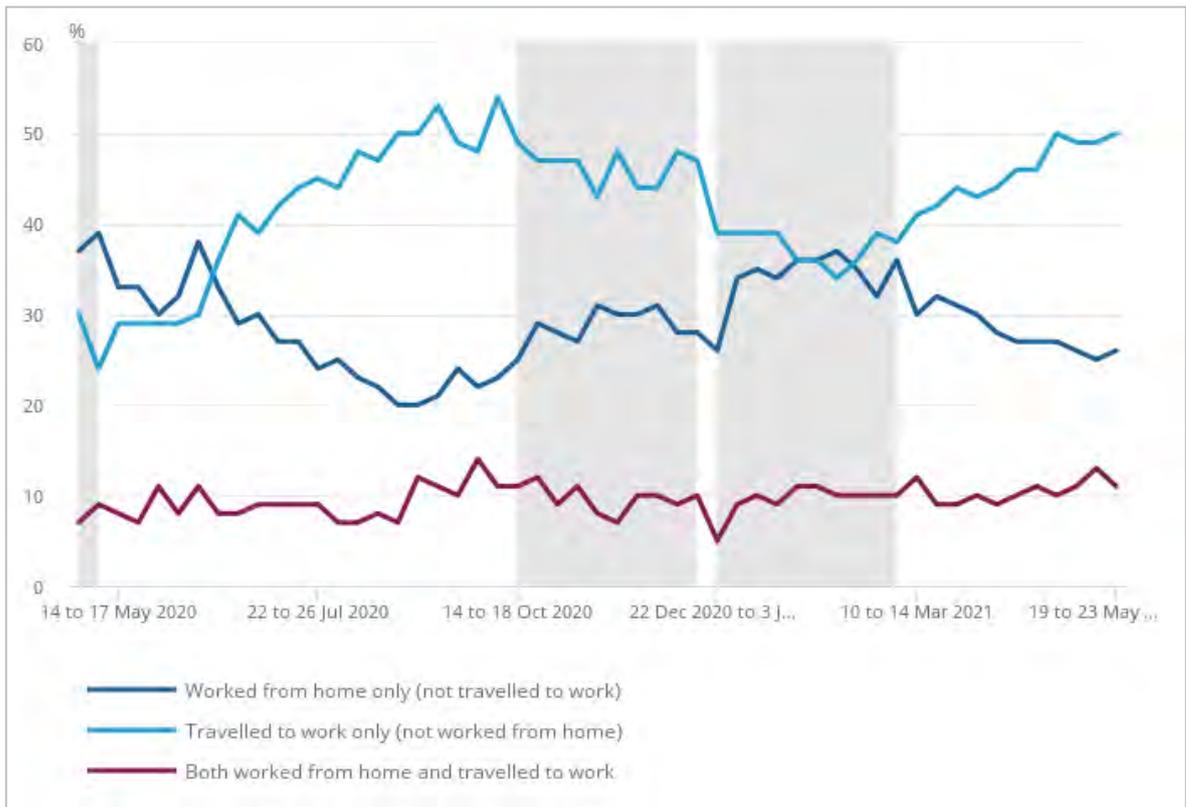
Source: CE/ Icenl

- 9.26 The modelled reduction in industrial floorspace / land needs is however not considered reliable because of the weak relationship between employment trends and future floorspace needs in the manufacturing sector influenced by productivity changes and the need for modern floorspace.

Sensitivity to Changes in Homeworking

- 9.27 Future office space requirements will be influenced by the growth in home working. This has increased in office-based sectors significantly influenced by the Covid-19 pandemic and Government imposed lockdowns and ‘work at home’ guidance.
- 9.28 The chart below the ONS Opinions and Lifestyle Survey shows the influence of these factors on home working on a month-by-month basis.

Figure 9.1: Proportion of Working Adults working exclusively from Home



Source: ONS Opinions and Lifestyle Survey

9.29 It is somewhat early to identify clearly how this will settle down over time, but it is likely that for office-based activities in particular, the level of home working is likely to remain higher than pre-pandemic and hybrid working (part from home, part in an office) will remain more significant, with potential implications for future office floorspace requirements.

Trends in Home and Hybrid Working

Data on homeworking shows that this has varied spatially over time, with ONS' analysis showing that this positively correlates with the stringency of Coronavirus restrictions. The latest data shows that between 19-30th Jan 2022, 36% of working adults reported having worked from home at least once in the last 7 days. Our core modelling builds in a proportion of home working of up to 15% by sector, but this is based on the pre-pandemic position and could under-estimate future levels.

It is clear that there are benefits and disbenefits of home working; with offices supporting coloration, social interaction, and staff development. Home working on the other hand can reduce travel time/cost and improve their work/life balance; and may reduce employers' property costs.

Different businesses are however responding in different ways, and that the situation is evolving (on almost a monthly frequency) making it difficult to predict future requirements for office space.

Many businesses and workers have embraced home and hybrid working patterns. It seems likely therefore that there will be some reduction in office space requirements as a result. The scale of this is difficult to precisely quantify and working patterns are still evolving, and it is somewhat difficult to quantify how businesses may respond in considering future space requirements (with occupancy patterns currently higher for mid-week working days).

- 9.32 A sensitivity model has therefore been developed which reduces the officed based requirements under the circumstance that post pandemic there is a reduced requirement due to home working. This is run at reduction of 30% of the office needs modelled in the initial analysis, as below to provide (alongside the main modelling) a set of parameters for office floorspace needs.

Table 9.6 Labour demand land needs 2021-41, sqm – Office Sensitivity Analysis

	Offices	
	Standard need	Need reduced 30%
North Warwickshire	22,800	16,000
Nuneaton and Bedworth	10,100	7,100
Rugby	16,500	11,600
Stratford-on-Avon	25,900	18,100
Warwick	56,900	39,800
Coventry	58,300	40,800
Total	190,400	133,300

Source: CE/ Icenl

Table 9.7 Labour demand land needs 2021-41, ha – Office Sensitivity Analysis

	Offices	
	Standard need	Need reduced 30%
North Warwickshire	4.6	3.2
Nuneaton and Bedworth	2.0	1.4
Rugby	3.3	2.3
Stratford-on-Avon	5.2	3.6
Warwick	3.8	2.7
Coventry	3.9	2.7
Total	22.7	15.9

Source: CE/ Icenl

- 9.33 The market evidence is of corporate office occupiers downsizing on lease events which is increasing giving credence to the sensitivity analysis. It would be prudent to monitor trends in the coming cycle with regards to the office market to understand how demand manifests in the post pandemic era.

This can then inform development management and the future review of policies in line with a “plan, monitor and manage” approach.

Projection of Floorspace Trends

- 9.34 The second main modelling approach is to project forwards trends in total floorspace. Using data from the VOA, we have derived net change in floorspace trends to model a future trend-based need. This incorporates all units as it is not possible to separate large and small scale industrial units for historic VOA data.
- 9.35 Three periods have been used to derive projections based on an annualised average need on the last 5, 10 and 15 years change (i.e. from three alternate starts to present being 2014/15, 2009/10, 2004/05).
- 9.36 For industrial, the most recent trends see a fast growth in industrial floorspace. However for offices, historic growth has been followed by a period of decline. Recent office trends are likely to have been influenced by Permitted Development Rights which may have had an excessive influence on floorspace losses. The market analysis shows office vacancy rates having fallen from almost 9% in 2012 to 4% in 2020 but have seen some subsequent growth.

Table 9.8 VOA Trend Forecast 2021-41, sqm

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	- 12,000	- 8,000	5,300	1,040,000	680,000	780,000
Nuneaton and Bedworth	- 12,000	- 12,000	9,300	80,000	-100,000	-20,000
Rugby	- 28,000	- 6,000	38,700	540,000	440,000	120,000
Stratford-on-Avon	- 60,000	- 20,000	28,000	180,000	-160,000	20,000
Warwick	-	18,000	52,000	-140,000	-40,000	-60,000
Coventry	- 124,000	- 74,000	- 16,000	260,000	-220,000	-480,000
Total	- 236,000	- 102,000	117,300	1,960,000	600,000	360,000

Source: VOA

Table 9.9 VOA Trend Forecast 2021-50, sqm

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	-17,400	-11,600	7,700	1,508,000	986,000	1,131,000
Nuneaton and Bedworth	-17,400	-17,400	13,500	116,000	-145,000	-29,000
Rugby	-40,600	-8,700	56,100	783,000	638,000	174,000
Stratford-on-Avon	-87,000	-29,000	40,600	261,000	-232,000	29,000
Warwick	0	26,100	75,400	-203,000	-58,000	-87,000
Coventry	-179,800	-107,300	-23,200	377,000	-319,000	-696,000
Total	-342,200	-147,900	170,100	2,842,000	870,000	522,000

Source: VOA

- 9.37 For completeness the sqm floorspace projections above have been converted to a land need on the same plot ratios as previous.

Table 9.10 VOA Trend Forecast, 2021-41, ha

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	-2.4	-1.6	1.1	260	170	195
Nuneaton and Bedworth	-2.4	-2.4	1.9	20	- 25	- 5
Rugby	-5.6	-1.2	7.7	135	110	30
Stratford-on-Avon	-12.0	-4.0	5.6	45	- 40	5
Warwick	-	3.6	10.4	- 35	- 10	- 15
Coventry	-8.3	-4.9	-1.1	65	- 55	- 120
Total	-30.7	-10.5	25.6	490	150	90

Source: VOA

Table 9.11 VOA Trend Forecast, 2021-50, ha

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	-4	-	8	377	247	283
Nuneaton and Bedworth	-8	-4	4	29	- 36	- 7
Rugby	-	4	12	196	160	44
Stratford-on-Avon	-16	-16	-4	65	- 58	7
Warwick	-32	-20	24	- 51	- 15	- 22
Coventry	-144	-48	68	94	- 80	- 174
Total	-204	-84	112	711	218	131

Source: VOA

- 9.38 For the purpose of this exercise, Icen considers the 2010-20 period (last ten years) to be the most appropriate period to consider a future trend from. For industrial modelling, it incorporates a relatively stable period followed by a more recent faster growth period.
- 9.39 The modelled outputs are based on net changes in floorspace. However a considerable amount of development arises from churn within the market, with new space brought forward to replace aged/

functionally redundant floorspace. The figures above on their own are likely to under-estimate future development needs.

9.40 We would note that the spatial distribution of industrial need has been influenced in part by land availability, and in particular would note:

- The influence of the designation of what were Regional Logistics Sites at Hams Hall and Birch Coppice, and subsequent extensions to these sites, on completions in North Warwickshire;
- Constraints on industrial land supply in Coventry, with the major industrial locations being Whitley Business Park/Whitley South and Prologis Keresley where available supply has become increasingly constrained. Major schemes around Coventry – such as Ansty Park and Prologis Ryton – fall within Rugby District;
- A relatively constrained supply position for a number of years in Nuneaton and Bedworth prior to the adoption of the Local Plan in 2019, which released a number of sites from the Green Belt. The supply position in the immediate term can be expected to contribute to stronger completions trends in the short-term.

The implications of past supply trends for industrial land, if it were to be replicated, would see future provision continuing to be concentrated in North Warwickshire. This is particular reflects the designation of Regional Logistics Sites in the RSS within the Borough.

Whilst North Warwickshire remains an attractive location for warehousing and logistics development in particular, there is a case for seeking a broader spread of industrial land provision between the authorities within the sub-region and seeking positive growth in industrial land supply in all parts of the Coventry and Warwickshire sub-region.

9.41 For offices the same 10 year period is also recommended for use but under the caveat that considerable losses have occurred through the PDR process outside of the commercial floorspace market dynamic, which is discussed further below. The influence of PDR means that that limited weight should be attached to the net changes in floorspace based on recent trends in projecting future needs.

9.42 Of note, Coventry has for some years been seeking to bring forward city centre office floorspace, with the Friargate scheme delivering over the period since 2018 having contributed to office floorspace completions following a number of years of very low delivery and losses. The floorspace gain over the 2019-21 period has averaged almost 26,000 sq.ft pa (2,400 sqm). The overall implications are discussed further below.

Completions Trend

- 9.43 In addition to the VOA data, total employment completions have been provided by authorities as below. We have set out a projection of floorspace needs based on trends over this period. This has involved reviewing data provided directly or through AMRs to consider completions 2011/12 to 2019/20 and projecting that forward as an annualised average.
- 9.44 In some instances detail on data has been limited, therefore Iceni has sought to independently verify where possible the completions and their nature through engagement with the Councils. It is also of note that these are gross trends (rather than net completions having regard to losses) – theoretically the VOA data provides an indication of net monitored change.

Table 9.12 Completions Trend Forecast 2021-41, ha (gross)

	Total 2011-19	Average 2011-19	2021-41 need	%E(g)(i)	%B8 (strategic sites, est.)	Net as % gross
North Warwickshire (2011-18)	121.8*	15.2	304.4	2%	83%*	N/A
Nuneaton and Bedworth	21.5	2.4	47.9	5%	19%	91%
Rugby**	133.6	14.8	296.9	6%	53%)	N/A
Stratford-on-Avon	59.8	6.6	132.9			24%
Warwick	20.2	2.2	44.9			N/A
Coventry	91.3	10.1	202.8	23%	19%	N/A
Total	448.2	51.5	1,029.8			

Source: LPA / AMR

*Excluding open storage at Baddesley Colliery for BMW and reduced plot for BMW at Hams Hall

** Inc Coventry's unmet need contributions at Ansty Park and Prologis Ryton

Table 9.13 Completions Trend Forecast 2021-50, ha (gross)

	Total 2011-19	Average 2011-19	2021-50 need	%E(g)(i)	%B8 (strategic sites, est.)	Net as % gross
North Warwickshire (2011-18)	121.8*	15.2	441.4	2%	83%*	N/A
Nuneaton and Bedworth	21.5	2.4	69.4	5%	19%	91%
Rugby**	133.6	14.8	430.5	6%	53%)	N/A
Stratford-on-Avon	59.8	6.6	192.7			24%
Warwick	20.2	2.2	65.2			N/A
Coventry	91.3	10.1	294.1	23%	19%	N/A
Total	448.2	51.5	1,493.2			

Source: LPA / AMR

*Excluding open storage at Baddesley Colliery for BMW and reduced plot for BMW at Hams Hall

** Inc Coventry's unmet need contributions at Ansty Park and Prologis Ryton

-
- 9.45 It is evident that North Warwickshire and Rugby have been key contributors to employment floorspace completions, driven by large units at Hams Hall, Prologis Ryton, Rugby Gateway, Antsy Park and Birch Coppice. Coventry's deliveries are particularly influenced by development south west part of Whitley Business Park (Scimitar Way). Much of the focus of these developments is large scale B8, with B2 at Antsy Park.
- 9.46 Coventry's office floorspace delivery has increased in recent years as Friargate has begun to come forward (2018/19 onwards).

Comparing Trends

- 9.47 The table below (Table 9.14) compares the labour demand models, completion trends and the VOA floorspace trends for the 2021-41 period (completions are only presented in the Ha figures).

Table 9.14 Employment Land Needs 2021-2041, sqm (000s)

	Office		Industrial				Total	
	Labour demand	10yr VOA office	Labour demand ind.	Labour demand w'rhse	Labour demand ind. & w'rhse	10yr VOA ind. & w'rhse	Labour demand	10yr VOA
N. Warwickshire	23	-8	-16	91	75	680	98	680
N. and Bedworth	10	-12	-22	23	1	-100	11	-110
Rugby	17	-6	-17	59	41	440	58	460
Stratford-on-Avon	26	-20	-42	17	-25	-160	1	-240
Warwick	57	18	-29	41	12	-40	69	-140
Coventry	58	-74	-45	71	27	-220	85	-460
Total	190	-102	-171	302	131	600	321	190

Source: VOA / CE/lceni

Table 9.15 Employment Land Needs 2021-2041, ha

	Office		Industrial				Total		Completions		
	Labour demand	10yr VOA office	Labour demand ind.	Labour demand w'rhse	Labour demand ind. & w'rhse	10yr VOA ind. & w'rhse	Labour demand	10yr VOA	B1	All exc. B1a / B8 S	B8 Strategic
N. Warwickshire	4.6	-1.6	-3.2	22.7	19.4	151	24.0	151	6.9	44.9	252.6
N. and Bedworth	2.0	-2.4	-4.4	5.8	1.4	-22	3.4	-26	2.4	36.4	9.1
Rugby*	3.3	-1.2	-3.5	14.7	11.2	98	14.5	102	19.1	120.4	157.4
Stratford-on-Avon	5.2	-4.0	-8.4	4.3	-4.1	-36	1.1	-41.3	/	132.9	/
Warwick	11.4	3.6	-5.9	10.3	4.4	-9	8.2	-29	/	44.9	/
Coventry	3.9	-4.9	-8.9	17.8	8.9	-49	12.8	-97	46.2	118.0	38.5
Total	30.3	-10.5	-34.2	75.6	41.3	133	64.0	49	74.6	497.6	457.6

Source: VOA / CE/lceni

* Inc Coventry's unmet need contributions

10. STRATEGIC B8 LAND USE FORECASTING

Methodology – Background

10.1 Land-use forecasting for other commercial sectors, such as offices or retail, often seeks to relate employment growth to the need for additional floor space, using consistent and robust employment densities. This methodology is potentially unsuitable for the logistics sector for three reasons:

- Warehousing units have a much shorter functional or economic life than other types of commercial property e.g. office buildings. There is a consequent need to develop new units, much of which is needed to replace existing life-expired capacity;
- There is no consistent or robust employment density ratio that can be applied to the B8 sector. The primary function of warehousing is to handle cargo, meaning that demand for floor space is driven by factors such as cargo type (retail sector), volumes and throughput rates. This in turn dictates then employment requirements (numbers, skills etc..). Grocery retail has high throughputs rates (goods are picked at less than pallet-load quantities) and thereby requires higher employment levels when compared with slower moving lines which are stored and re-distributed at pallet-level quantities. Consequently, warehouses with broadly the same quantum of floor space can have significantly different employment levels; and
- Increasing automation within warehouses, particularly for e-commerce, suggests future employment densities will be lower than today.

10.2 The land-use forecast methodology used in this section therefore seeks to overcome the apparent weakness. It is derived from the following key factors relating to new logistics facilities:

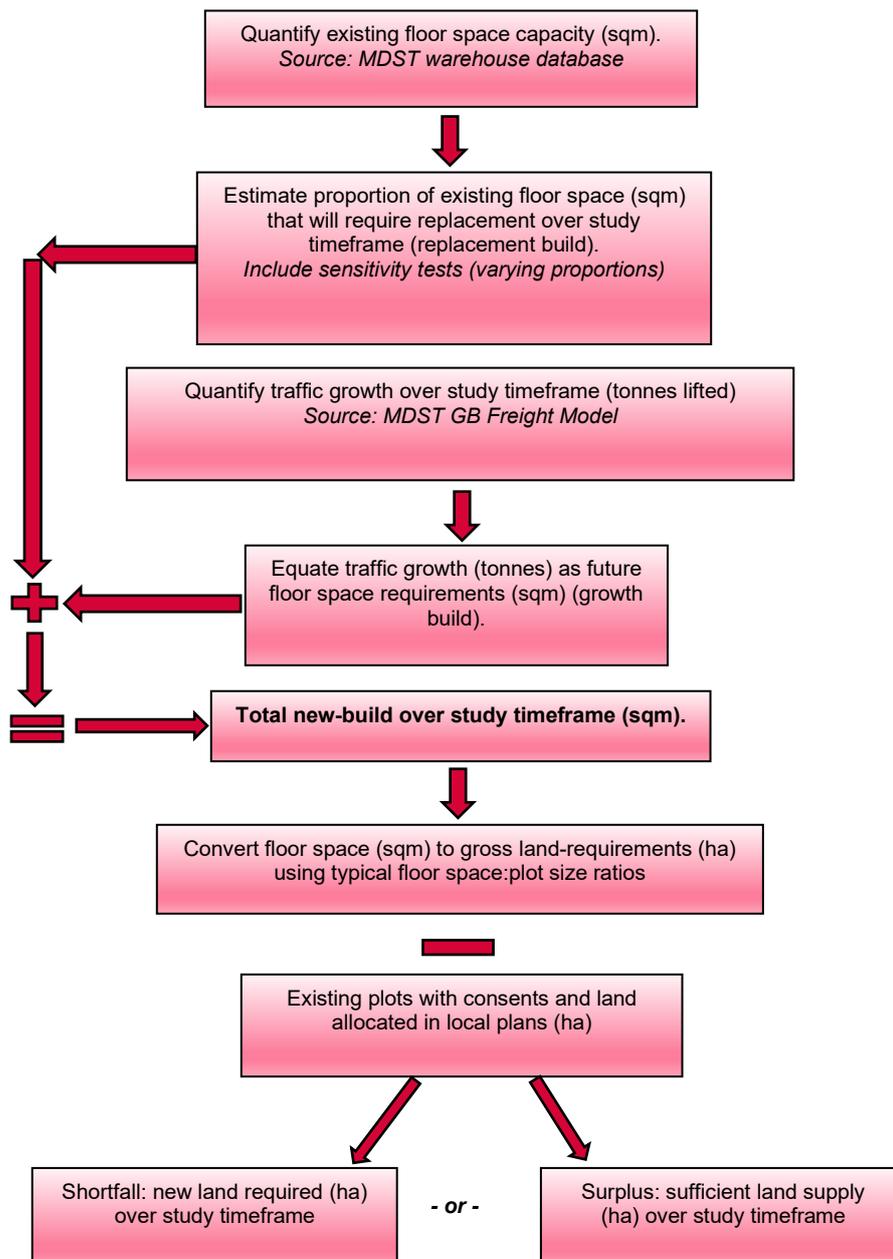
- The continual need to build new large-scale warehousing as a replacement for existing capacity which, over time, becomes life-expired (**replacement build**); and
- Long-term growth in the demand for goods in the wider economy and the subsequent need for additional floor space in order to handle that growth (**growth build**).

10.3 Figure 10.1 overleaf seeks to summarise the forecast methodology.

10.4 Existing warehouse capacity can be quantified from available data sources, with a view then reached as to the likely replacement rate based on experience of the logistics sector. Freight traffic growth (a proxy for growth in the demand for goods) can be forecast using economic or traffic models, in this case the MDST GB Freight Model (used to produce forecasts for Network Rail and Highways England among other bodies). The growth is then related to floor space using cargo storage density and throughput rates expected at a modern distribution centre.

10.5 The base line forecast year adopted for this forecast exercise is 2021 as this represents the baseline position in terms of existing warehousing stock of over 9,000 sq.m. The key primary output is total new-build rates over a future time period (i.e. future demand for new-build units), measured as square metres of warehouse floor space. In this case, new-build rates up to 2050 have been forecast, with intervening years 2031 and 2041 also estimated. The forecasts are for the West Midlands region and for the Coventry and Warwickshire study area.

Figure 10.1: Overview of Replacement Demand and Traffic Growth Forecasting Methodology



Existing Warehouse Capacity

- 10.6 Given the above, the starting point of the land-use forecasting process is therefore to quantify the existing supply of large-scale logistics and distribution floor space capacity within the West Midlands region and the Coventry and Warwickshire study area. The data has been derived from MDST's warehouse database, which has been compiled from the Valuation Office Agency (VOA) non-domestic Rating List records (a record of all commercial property in England and Wales by floor space function and location, collated for Business Rates purposes). We have interrogated the raw database and extracted floor space data within commercial buildings with a designation 'warehouse' or a similar classification. For clarification, this includes:
- Floor space designated as 'warehouse' or similar within a building whose primary classification is 'Warehouse and Premises' i.e. a building purposely built to receive, store and distribute cargo (the classic distribution centre); and
 - Floor space designated as 'warehouse' or similar within a building that has some other primary classification e.g. a 'Factory and Premises' which contains floor space used to store and distribute goods manufactured at that site.
- 10.7 Property where the warehouse floor space (as defined) is greater than 9,000 square metres in total has been included, this broadly equating to buildings around 100,000 sq ft or larger, the logistics industry's recognised definition of a large-scale distribution centre. Other ancillary floor space designations (e.g. offices) have been excluded i.e. the total 'headline' size of a commercial property will be greater once these other floor space functions are included. Further, while the total quantum of 'warehouse' or similar floor space within an individual property is greater than 9,000 square metres, the actual floor space may be distributed over two or more different areas (zones) within the individual commercial property.
- 10.8 Across England and Wales a total of 2,438 buildings covering 51 million square metres of floor space can be identified from the VOA Rating List data (as at April 2021). A breakdown of these figures by Government Office Region are presented in the table below. The equivalent commercial property data in Scotland is collated by the Scottish Assessors Association (SAA). For reference, Scotland currently accommodates around 1.4 million square metres of large scale warehouse floor space, of which around 1.1 million square metres is located in the 'Central Belt'.

Table 10.1 : Current (2021) Large Scale Warehouse Capacity England and Wales, by Region

Region	000s sq m	Number Units	sqm/unit
East Midlands	10,142	402	25,228
North West	8,328	419	19,876
West Midlands	7,559	385	19,634
Yorkshire and The Humber	7,064	336	21,023
East	5,576	270	20,651
South East	4,021	204	19,710
South West	2,903	132	21,994
North East	1,947	90	21,637
London	1,870	121	15,454
Wales	1,588	79	20,102
Total	50,998	2,438	20,918

Source: MDS Transmodal warehouse database (VOA Rating List)

Table 10.2 Relative Market Share of Large-Scale B8 Warehousing by Region

	Market Share (%)	
	Floor Space	Number Units
East Midlands	20%	16%
North West	16%	17%
West Midlands	15%	16%
Yorkshire and The Humber	14%	14%
East	11%	11%
South East	8%	8%
South West	6%	5%
North East	4%	4%
London	4%	5%
Wales	3%	3%

Source: MDS Transmodal warehouse database (VOA Rating List)

- 10.9 The table shows that the East Midlands region hosts just over 10.1 million square metres of floor space across 402 commercial properties. It is the largest region in terms of total floor space (20% market share), though the North West has a greater number of units. The West Midlands region has the third largest concentration of large-scale warehousing in England and Wales, with just under 7.6 million square metres (15% market share when measured by floor space). The average floor space per commercial property in the West Midlands is around 19,600 square metres, compared with the national average of 20,900 square metres per unit.
- 10.10 North Warwickshire has the largest concentration of warehousing in the region with just under 0.9 million square metres of floor space across 36 properties. There are also further significant

concentrations of floor space in Birmingham, Stoke-on-Trent and Staffordshire generally. Coventry and Rugby both have around 0.5 million square metres of floor space. The position with respect to the Coventry and Warwickshire study area is shown in the table below.

Table 10.3 Current (2021) Large-Scale Warehouse Floor Space in Coventry and Warwickshire

Local Authority	000s sq m	Number Units
North Warwickshire	874	36
Coventry	505	25
Rugby	431	21
Warwick	189	11
Nuneaton & Bedworth	173	9
Stratford On Avon	71	5
Total	2,244	107
Mean sqm/unit	20,969	

Source: MDS Transmodal warehouse database (VOA Rating List)

10.11 Just over 2.2 million square metres of large-scale warehouse floor space is located in the Coventry and Warwickshire study area. This represents around 30% of the West Midlands regional total. Also note that the mean size per unit is also larger than the regional average. This suggests that the Coventry and Warwickshire study area accommodates a sizeable concentration of floor space serving a national hinterland (both traditional NDCs plus e-commerce focused customer fulfilment centres or CFCs). These are generally larger than buildings serving a regional market given their greater role in holding inventory ahead of demand from end users.

10.12 The table below shows the quantum of large-scale logistics floor space that has been developed at rail-served sites in the Coventry and Warwickshire study area.

Table 10.4 Current (2021) Rail-served Large-Scale Warehousing in Coventry and Warwickshire

	000s sq m
Birch Coppice	406
Hams Hall	316
ProLogis Park Coventry*	121
Total - Rail-served	843
Total - all floor space	2,244
% rail-served	38%

Source: MDS Transmodal warehouse database (VOA Rating List)

* Sidings alongside for conventional box wagons

- 10.13 Just over 0.8 million square metres of rail-served warehousing is identified in the study area, equating to around 38% of current capacity. In the case of Birch Coppice and Hams Hall, the rail connectivity is provided by the warehousing being located within the same site as an intermodal terminal, with containers transferred between rail wagons and warehousing using off-road shunting equipment on the private estate roads. At ProLogis Park, some of the warehousing units are directly served by rail sidings along one side and are designed to handle palletised and semi-bulk cargoes in conventional box/cargo wagons. These sidings were a condition of planning consent. The use of conventional wagons is only economic when moving large quantities in one move (i.e. full train load) between two rail-served facilities. They are therefore not generally suited to consumer type cargoes, which tend to move in smaller but frequent shipments e.g. in containers. The site has therefore never handled regular train services.
- 10.14 There are no further rail-served warehousing sites in the West Midlands, albeit the West Midlands Interchange SRFI (Four Ashes) has recently received planning consent via a DCO. There are also stand-alone intermodal terminals at Landor Street Birmingham (Freightliner Birmingham) and Telford. DIRFT is located just over the regional boundary in the East Midlands, though it will be the case that some intermodal traffic passing through the site will be to/from warehouse units in the West Midlands. It lies relatively close to Rugby. East Midlands Gateway is located close to the A42 to the north. Overall, around 11% of the West Midlands warehouse capacity is rail-served albeit it is currently located in the Coventry and Warwickshire study area. For reference, across England and Wales around 6% of warehouse floor space is rail-served.

Use of Rail Freight

The National Policy Statement (NPS) on National Networks promotes the development of a network of Strategic Rail Freight Interchanges (SRFI) to aid the transfer of freight from road to rail, supporting sustainable distribution and reducing trip mileage of freight movement on the national and local road networks. It aims to optimise the use of rail in long-haul primary trunk journeys, with other modes then providing the secondary (final leg) of a trip, with a view to reducing carbon

emissions, addressing congestion and improving capacity on the road network, and addressing pollution. Government thus seeks to deliver a network of SRFIs.

It should be noted that warehousing on rail-served sites is not required to use rail; and businesses may locate to these sites to 'future proof' the sustainability of their operations whilst non rail-served sites can operate on a 'satellite' basis making use of rail terminals which are close to them. With the end of 'red diesel' exemptions in April 2022 there will be no financial benefit from warehousing being located on sites which include a rail terminal.

Coventry and Warwickshire is relatively well served by existing SFRI sites either within the sub-region or close to it (including at DIRFT) and there is the potential for development of a further site to come forwards at Hinckley.²⁵ We do not consider that there is currently sufficient evidence to justify recommending specific development of further rail-served capacity in Coventry & Warwickshire at the current time.

However to support the use of rail in transporting goods (with associated sustainability benefits), consideration should be given to the providing additional warehousing capacity in locations close to the SRFI to support and enable growth in the use of rail in transporting goods. Bringing forward capacity in locations close to existing SRFI, which could include as extensions to existing sites or new sites - as well as road-based locations elsewhere – is therefore appropriate.

Replacement Build

- 10.15 Most newly built floor space is a replacement for existing warehouse stock which is 'life expired'. While this may not be related to physical obsolescence (i.e. many older buildings will be structurally sound), they can become functionally obsolete. This is particularly the case concerning the growth of e-commerce, where many older buildings cannot accommodate the automated picking/packaging equipment required for on-line sales, or the ability to handle distribution to retail outlets alongside direct to home e-commerce deliveries under the same roof. Many existing retailers have therefore commissioned more modern facilities (to service their e-commerce platforms) which have directly replace older distribution buildings (e.g. Marks & Spencer at East Midlands Distribution Centre). Also, new floor space has been built for emerging e-commerce only retailers, such as Amazon or ASOS, much of which has effectively replaced floor space previously operated by 'bricks and mortar' retailers which have either ceased trading or have radically downsized to address the fall in 'high street' sales.

²⁵ <https://www.hinckleynrfi.co.uk/>

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- 10.16 A second factor is the ability, when compared with 20-30 years ago, to operate much larger distribution buildings. This has been facilitated by advances in modern ICT inventory management systems which have permitted much larger warehouses to be operated more efficiently than was previously the case. As a result, many operators have sought economies of scale can through merging operations based at multiple sites to one new location. Finally, changing market conditions, both within specific companies/sectors and in the wider economy, means that warehouse operations might need to relocate in order to remain competitive. Occupiers who previously sourced goods from domestic suppliers but now predominantly import from deep-sea markets may seek a new location at a rail-linked site in order to remain competitive.
- 10.17 A suitable example of these three issues is the on-line retailer very.co.uk (formerly Littlewoods and the Shop Direct Group). They have recently closed three older (functionally-obsolete) warehouse units in the Manchester area. The combined operations have been replaced by a modern purpose-built warehouse at the new East Midlands Gateway SRFI which can accommodate significant levels of automation. Economies of scale will be gained by merging three facilities into a single operation under one roof, and the East Midlands Gateway location was selected as it gave them direct access to an intermodal rail terminal, both as a means to reduce transport costs from the deep-sea container ports and 'future proofing' with regards to de-carbonisation.
- 10.18 Essentially, buildings reach the end of their useful economic life and are no longer suitable for their original designed use; a more modern replacement facility is therefore required. Older buildings can either be substantially refurbished for new occupiers or for a different use, or demolished and the plot 'recycled' for new buildings (which may or may not be warehousing). However, a consequence of this process is that new sites need to be brought forward (or new plots at existing sites) in order to allow occupiers to re-locate to new buildings, thereby releasing the existing facility for refurbishment or demolition.
- 10.19 In order to estimate the 'replacement build' element to 2050 (i.e. floor space which will become functionally obsolete or in some cases physically obsolete), the existing stock of large-scale warehousing in the West Midlands region and the Coventry and Warwickshire study needs to be considered. This has been undertaken and is detailed above.
- 10.20 On the basis that the average useful economic life of a modern warehouse building is 30 years, up to 2050 we could expect around 97% of the existing warehouse stock in the areas being considered to require replacement (i.e. $29 \text{ years}/30 \text{ years} = 97\%$). Likewise, up to 2031 and 2041 we could therefore expect around 33% and 67% respectively of the existing warehouse stock to require replacement. This can be considered the 'high replacement build' scenario as we have also considered a position where the rate of replacement begins to slow compared with historical trends. This may extend the useful life to around 40 years. This suggests that around 73% of the existing stock will require replacement up 2050. This can be considered the 'low replacement build' scenario.

10.21 The table below shows the estimated 'replacement build' rates under both scenarios for the Coventry and Warwickshire study and the West Midlands region to 2050.

Table 10.5 Replacement Build Rates to 2031, 2041 and 2050

Existing floor space - Coventry and Warks	2,244	000s sqm	
Existing floor space - West Midlands	7,559	000s sqm	
	000s sqm		
	2031	2041	2050
High Replacement Scenario			
Coventry and Warks	748	1,496	2,169
West Midlands	2,520	5,039	7,307
Low Replacement Scenario			
Coventry and Warks	561	1,122	1,627
West Midlands	1,890	3,780	5,480
High			
% replacement assuming	33%	to 2031	
30 years economic life	67%	to 2041	
	97%	to 2050	
Low			
% replacement assuming	25%	to 2031	
40 years economic life	50%	to 2041	
	73%	to 2050	

Source: MDST Warehouse Database and estimated replacement rates

Growth Build

10.22 Demand for warehouse floor space is driven by the need to handle, store and re-distribute cargo. Therefore, future economic growth in the wider economy along with forecast population increases will lead to a growth in the volume of consumer goods handled. This in turn will lead to increasing demand for additional warehouse floor space. Consequently, new warehouses are constructed partly to accommodate growing traffic volumes over the long term (the 'growth build' element).

10.23 In order to estimate the growth build element two factors need to be considered, namely:

- The current (2021) volume of goods which are delivered directly to large-scale distribution centres in Coventry and Warwickshire and the West Midlands region (i.e. only including those commodities which pass through large-scale distribution centres, so excluding bulk and semi-bulk cargoes such as aggregates and forest products); and

-
- Likewise, the volumes of goods that can be expected to be delivered directly to large-scale distribution centres in Coventry and Warwickshire and the West Midlands region in the forecast years up to 2050.
- 10.24 Both current and forecast volumes (as described) have been produced using the MDS Transmodal GB Freight Model. This is an analytical tool which can estimate existing freight flows (by origin-destination, mode, commodity and port of entry/departure for international traffics) and generate forecasts for future years (on the same basis) under different policy and economic scenarios. It has recently been used to generate forecasts for the DfT, Network Rail, Highways England, the NIC and Midlands Connect.
- 10.25 In 2020, MDS Transmodal produced an updated set of rail freight demand forecasts for Network Rail for the years 2023, 2033 and 2043 (to inform their long term planning process). They were subsequently re-produced in the recently published Solent-Midlands Multimodal Freight Strategy jointly produced by Network Rail and Highways England. We have therefore extracted the relevant rail and road forecast traffic volumes from the 'central' scenario (Scenario E) Network Rail forecasts. Values for 2031, 2041 and 2050 were interpolated from the 2033 and 2043 outputs.
- 10.26 The table below shows the total volume of cargo currently destined for Coventry and Warwickshire (for commodities which pass through large-scale warehouses) alongside the proportion estimated to be delivered directly to large scale distribution centres. Based on previous projects, we estimate this to be 45% of total tonnage delivered for road freight, while all inbound containerised rail traffic is assumed to be destined for a large-scale warehouse. It is also assumed that a proportion of intermodal rail traffic destined for an East Midlands terminal (DIRFT and East Midlands Gateway) will eventually end up in a West Midlands distribution centre (in this case, 25% is assumed). On the same basis, projected volumes for the forecast years up to 2050 are presented. The table following shows the equivalent figures for the West Midlands region.

Table 10.6 Existing and Forecast Freight Traffic Destined for Coventry and Warwickshire

Coventry & Warks	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	25,552	27,838	30,713	33,036
Total to warehouse	11,499	12,527	13,821	14,866
Intermodal Rail				
Total	943	985	1,152	1,246
To warehouse	943	985	1,152	1,246
From East Mids rail terminal - To warehouse	409	701	1,051	1,340
Total to warehouse	1,352	1,686	2,204	2,587
Total to warehouse	12,851	14,213	16,025	17,453
Growth v 2021		1,362	3,174	4,602

Source: MDS Transmodal GB Freight Model

Table 10.7 Existing and Forecast Freight Traffic Destined for West Midlands

West Midlands	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	132,003	147,002	167,538	183,528
Total to warehouse	59,402	66,151	75,392	82,588
Intermodal Rail				
Total	2,423	3,107	4,427	5,328
To warehouse	2,423	3,107	4,427	5,328
From East Mids rail terminal - To warehouse	409	701	1,051	1,340
Total to warehouse	2,832	3,808	5,478	6,669
Total to warehouse	62,234	69,959	80,870	89,256
Growth v 2021		7,725	18,636	27,022

Source: MDS Transmodal GB Freight Model

- 10.27 The forecasts, as described, indicate that for the Coventry and Warwickshire study area an additional 4.6 million tonnes can be expected to pass through large scale distribution centres in 2050 compared with 2021. Likewise, the equivalent figure for the West Midlands region is an additional 27 million tonnes over 2021 volumes.
- 10.28 The growth in annual traffic for each forecast year (when compared with 2021 levels) have subsequently been converted into the need for additional floor space i.e. the growth build element,

using generally accepted 'conversion factors' which relates annual tonnage throughput and floor space at large scale 'high bay' type warehouses. The tables below show the forecast traffic growth alongside the additional floor space required to handle that growth.

Table 10.8 Forecast Traffic Growth and Additional Floor Space Required

	2031	2041	2050
Coventry and Warks			
Traffic growth v 2021 (000s tonnes)	1,362	3,174	4,602
Additional floor space (000s sqm)	54	125	181
West Midlands			
Traffic growth v 2021 (000s tonnes)	7,725	18,636	27,022
Additional floor space (000s sqm)	304	733	1,063

Source: MDS Transmodal GB Freight Model and Consultant estimations

Total New-Build and Land Requirements

- 10.29 By combining the 'replacement build' and 'growth build' elements, the total warehouse new-build which can be expected for each forecast year can be calculated. This is shown in the tables below for the various scenarios.

Table 10.9 Forecast New-Build Rates to 2050 – Coventry and Warwickshire

	000s sqm		
Coventry and Warks	2031	2041	2050
High Replacement Scenario			
Replacement build	748	1,496	2,169
Growth build	54	125	181
Total	802	1,621	2,350
Low Replacement Scenario			
Replacement build	561	1,122	1,627
Growth build	54	125	181
Total	615	1,247	1,808

Source: MDS Transmodal GB Freight Model and Consultant estimations

Table 10.10 Forecast New-Build Rates to 2050 – West Midlands

West Midlands	000s sqm		
	2031	2041	2050
High Replacement Scenario			
Replacement build	2,520	5,039	7,307
Growth build	304	733	1,063
Total	2,824	5,773	8,371
Low Replacement Scenario			
Replacement build	1,890	3,780	5,480
Growth build	304	733	1,063
Total	2,194	4,513	6,544

Source: MDS Transmodal GB Freight Model and Consultant estimations

NB: The West Midlands total includes the new-build rate for Coventry and Warwickshire

- 10.30 For the High Replacement scenario within Coventry and Warwickshire, around 1.6 million square metres of new large-scale warehouse floor space is forecast to be built by 2041 and just under 2.4 million square metres by 2050. For the West Midlands region as a whole, we would expect around 8.4 million square metres of new-build floor space by 2050.

Note the 'land required' figure in the tables above is simply the gross area of land required to accommodate the new-build forecast assuming a 40% floorspace to plot footprint ratio. It is not the amount of new land that will need to be brought forward in plans, as no account has been made at this stage of existing consents or local plan allocations.

Traffic Forecasts – Sensitivity Analysis

- 10.31 We have also undertaken a 'sensitivity test' freight forecast. In this case, the forecast traffic volumes quoted above for 2050 are estimated to grow by a further 15%, with the volumes in the interval years interpolated between the higher 2050 forecast and the 2021 actual. This is shown in the table below for Coventry and Warwickshire and the West Midlands region.
- 10.32 The sensitivity analysis is run to understand the effect of changes in the traffic growth volumes on the overall need for warehousing floorspace. It aims to understand and quantify what impact a 15% uplift in traffic volumes would have on warehouse space.

Table 10.11 Sensitivity Test Traffic Forecast (2050 Traffic Forecast + 15%) – Coventry and Warwickshire

Coventry & Warks	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	25,552	29,842	34,131	37,991
Total to warehouse	11,499	13,429	15,359	17,096
Rail				
Total	943	1,112	1,281	1,433
To warehouse	943	1,112	1,281	1,433
From East Mids rail terminal - To warehouse	409	799	1,190	1,541
Total to warehouse	1,352	1,912	2,471	2,975
Total to warehouse	12,851	15,340	17,830	20,071
Growth v 2021		2,490	4,979	7,220

Source: MDS Transmodal GB Freight Model plus 15% additional traffic

Table 10.12 Sensitivity Test Traffic Forecast (2050 Traffic Forecast + 15%) – West Midlands

West Midlands	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	132,003	159,263	186,524	211,058
Total to warehouse	59,402	71,669	83,936	94,976
Rail				
Total	2,423	3,701	4,978	6,128
To warehouse	2,423	3,701	4,978	6,128
From East Mids rail terminal - To warehouse	409	799	1,190	1,541
Total to warehouse	2,832	4,500	6,168	7,669
Total to warehouse	62,234	76,169	90,104	102,645
Growth v 2021		13,935	27,870	40,411

Source: MDS Transmodal GB Freight Model plus 15% additional traffic

- 10.33 On this basis, for Coventry and Warwickshire an additional 7.2 million tonnes can be expected to pass through large scale distribution centres in 2050 compared with 2021 (or a further 2.6 million tonnes annually over the standard traffic forecast). Likewise, the equivalent figure for the West Midlands region is an additional 13.4 million tonnes over 2021 volumes.
- 10.34 As per above, the growth in annual traffic (compared with 2021 levels) for the sensitivity test traffic forecasts have subsequently been converted into the need for additional floor space using the same

generally accepted 'conversion factors'. The tables below show the sensitivity test forecast traffic growth alongside the additional floor space required to handle that growth.

Table 10.13 Sensitivity Test Forecast Traffic Growth and Additional Floor Space Required

	2031	2041	2050
Coventry and Warks			
Traffic growth v 2021 (000s tonnes)	2,490	4,979	7,220
Additional floor space (000s sqm)	98	196	284
West Midlands			
Traffic growth v 2021 (000s tonnes)	13,935	27,870	40,411
Additional floor space (000s sqm)	548	1,097	1,590

Source: MDS Transmodal GB Freight Model plus 15% and Consultant estimations

- 10.35 Again, by combining the 'replacement build' and 'growth build' elements, the total warehouse new-build which can be expected for each forecast year can be calculated. This is shown in the tables below for the various scenarios.

Table 10.14 Traffic Forecast and Sensitivity Test Comparison – Coventry & Warwickshire

	000s sqm		
Coventry and Warks	2031	2041	2050
High Replacement Scenario			
Replacement build	748	1,496	2,169
Growth build	98	196	284
Total	846	1,692	2,453
Low Replacement Scenario			
Replacement build	561	1,122	1,627
Growth build	98	196	284
Total	659	1,318	1,911

Source: MDS Transmodal GB Freight Model + 15% and Consultant estimations

Table 10.15 Traffic Forecast and Sensitivity Test Comparison – West Midlands

West Midlands	000s sqm		
	2031	2041	2050
High Replacement Scenario			
Replacement build	2,520	5,039	7,307
Growth build	548	1,097	1,590
Total	3,068	6,136	8,897
Low Replacement Scenario			
Replacement build	1,890	3,780	5,480
Growth build	548	1,097	1,590
Total	2,438	4,876	7,071

Source: MDS Transmodal GB Freight Model + 15% and Consultant estimations

Overall Results

- 10.36 The tables below therefore compares the standard traffic forecast outputs with those for the sensitivity test (for the High Replacement scenario). Overall, the sensitivity test only adds around 100,000 square metres to the new-build rate by 2050. This illustrates that the replacement demand – the need for newer, modern warehouse units - is the main driver of floorspace needs within the model.

Table 10.16 Traffic Forecast and Sensitivity Test Comparison

	000s sqm		
	2031	2041	2050
Coventry and Warks			
Traffic Forecast Low Replacement	615	1,247	1,808
Traffic Forecast High Replacement	802	1,621	2,350
Sensitivity Test High Replacement	846	1,692	2,453
Difference	44	71	103
West Midlands			
Traffic Forecast Low Replacement	2,194	4,513	6,544
Traffic Forecast High Replacement	2,824	5,773	8,371
Sensitivity Test High Replacement	3,068	6,136	8,897
Difference	244	363	527

- 10.37 Assuming a range of plot ratios, the requirement range for the study area’s strategic warehousing needs is set out below. This is then compared to the results of the completions trend analysis.
- 10.38 It is of note the 0.35 plot ratio was preferred in the Leicestershire Strategic Distribution 2021 report based on plot ratio testing. We consider this to be more appropriate based on recent development

trends. On this basis the modelling suggests that the completions trends of the 2011-19 period may exceed the needs over the plan period to 2041.

Table 10.17 Coventry and Warks Strategic Warehousing Land Needs 2021-2041, ha

	Sq.m floorspace	Land (Ha) @0.4 Plot Ratio	Land (Ha) @0.35 Plot Ratio
Traffic Forecast Low Replacement	1,247,000	312	356
Sensitivity Test Low Replacement	1,318,000	330	377
Traffic Forecast High Replacement	1,621,000	405	463
Sensitivity Test High Replacement	1,692,000	423	483
Completions Projection			458

Source: MDST/lceni

10.39 In drawing conclusions there are then a number of key issues which arise including:

- a) is it more appropriate to use the low or high replacement scenario;
- b) what weight should be given to the sensitivity testing and completions trends; and
- c) to what extent is it feasible to see replacement – i.e. redevelopment of buildings – happening on existing sites, or indeed former industrial sites, as opposed to requiring new land.

10.40 There are a number of different factors which need to be weighed up in assessing the 'high replacement' and 'low replacement scenarios.' These include:

1. Market evidence suggests that while many existing older buildings may be physically sound, they are increasingly becoming functionally obsolete. To a great extent, this situation is being driven by changes in the retail sector, and in particular the large growth rates for e-commerce. As noted above, many older buildings cannot accommodate the automated picking/packaging equipment required for on-line sales, or the ability to handle distribution to retail outlets alongside direct to home e-commerce deliveries under the same roof. Many existing retailers have been and are continuing to modernise their distribution facilities. A further consequence of e-commerce growth is a growing need for smaller purpose built 'cross-dock' type facilities close to urban conurbations where goods from on-line customer fulfilment centres can be transferred directly to LGVs/MGVs for final delivery to residential properties. This requirement is effectively replacing the traditional RDC warehouse.

2. The de-carbonising agenda is likely to drive further demand for warehouse facilities which are either directly served by the railway network (such as at Birch Coppice or Hams Hall) or at sites close to intermodal terminals. Long distance trunk-hauls from ports and to/from more distant domestic origins/destinations can then be undertaken by (predominantly) electric powered trains (as battery electric HGVs are unlikely to have sufficient range).

3. Increasing automation within warehouses and the need for RDCs and 'cross-dock' type facilities to be equipped with fast-charging points (in order that multiple LGVs/MGVs can be re-charged while they are loaded) is driving demand for warehouse facilities which have substantially higher electric power requirements. Many older warehouses are located where the regional electricity distribution network does not have sufficient capacity, leading to demand for new buildings at locations where grid power capacity is available.

4. Set against this, the capital values of many units build from the late 1990 onwards is likely to be too high to see them demolished. We would therefore expect to see some refurbishment (rather than replacement) of stock build post 2000 or sub-division to provide smaller units. Refurbishment is most likely for units on plots of over 10 ha.

10.41 These factors draw in different directions, and we consider that it would therefore be appropriate to take the midpoint between the low and high replacement scenarios in identifying a minimum level of floorspace provision. This equates to a minimum need for 410 ha to 2041.

10.42 We do however consider that there are there are factors which point to the potential to see stronger demand than this. Firstly is the shift towards e-commerce which has arisen from the Covid-19 pandemic, which has accelerated previous trends. Second is the effects of trade disruptions and macro-economic uncertainties, including the effects of Brexit and the blocking of the Suez Canal, on level of stock holding (the impacts of which have been to increase the requirements for warehouse space).

10.43 IcenI therefore consider that it would be appropriate to plan for future development to be in line with recent completions trends over the initial 10 year period (2021-31), with the subsequent decade then seeing potentially slower growth in line with the traffic growth and replacement demand modelling.

Table 10.18 Conclusions on the Quantitative Need for Strategic Warehousing Floorspace

	Ha
Need 2021-31 (based on completions trend)	229
Need 2031-41 (based on traffic growth and replacement demand)	205
Total need	434

10.44 As is standard practice, it is then appropriate to include a margin to support a choice of sites in a competitive market and ensure that there is some flexibility of supply to allow for some unforeseen delays in delivery without constraining the market. A 5 year margin based on the 5 year completions trend in considered appropriate.

10.45 The table below calculates on this basis the scale of development which we would recommend is planned for.

Table 10.19 Recommended Need for Strategic B8 – Coventry & Warwickshire

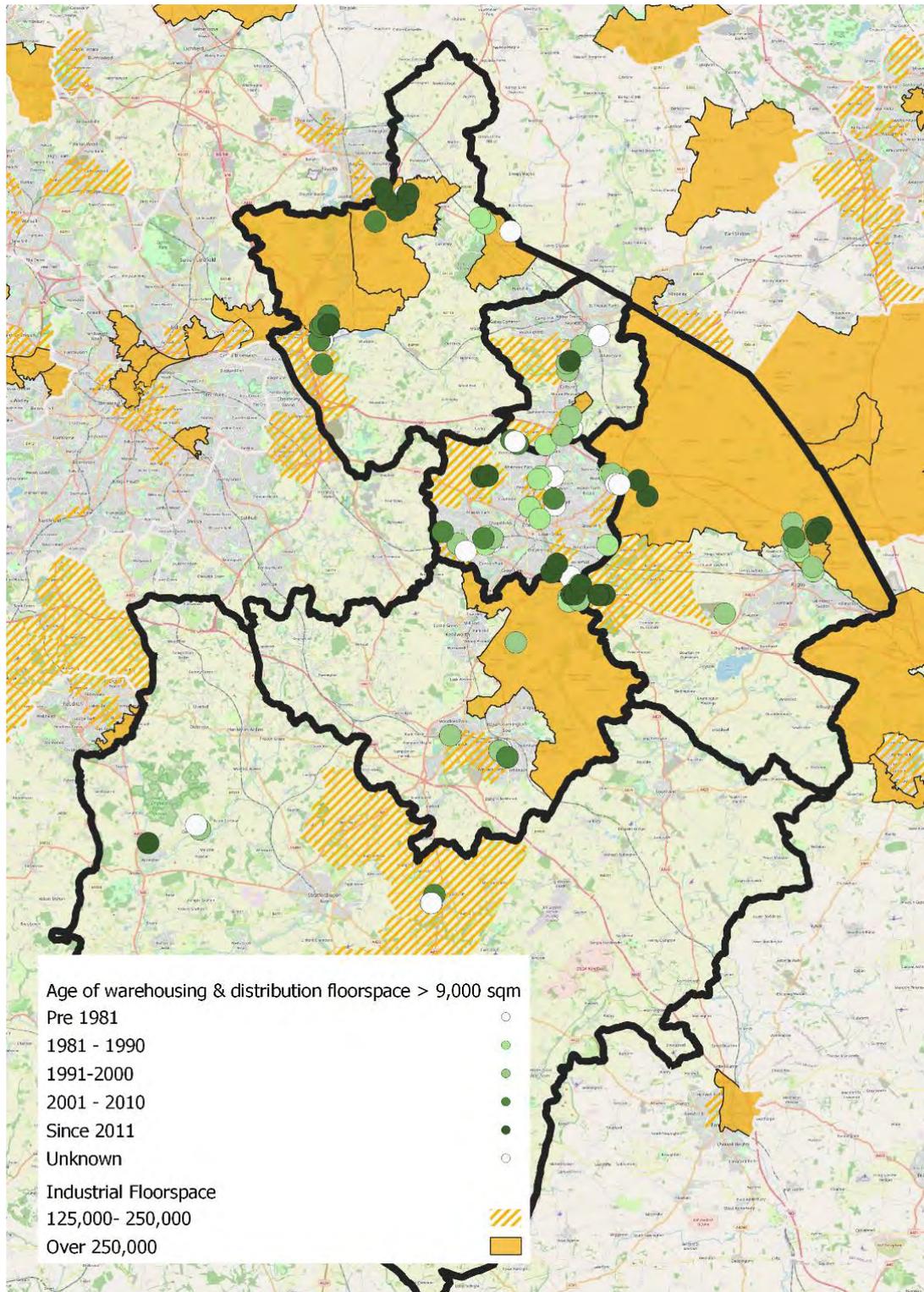
Ha	Need to 2041	Need to 2050
Base Need	491	594
5 Year Margin	115	115
Total Land Requirement	606	709

The Potential for Recycling or Reuse of Existing Strategic B8 Sites

- 10.46 The above analysis identifies the quantum of development which might be expected together with the appropriate supply-side margin to allow for demand uncertainties, slippage and ensure a choice of sites.
- 10.47 In this section we move on to consider the degree to which it might be realistic for part of the need identified to be met through recycling of existing sites, and to provide guidance for the detailed local consideration of the potential for this.
- 10.48 In general terms, sites which are likely to be suitable for redevelopment to provide new large warehousing units will be on plot of over 10 ha in good quality locations which relate well to the strategic road / main A-road network, have adequate power supply, are accessible by public transport and where there are no neighbouring uses which could restrict the operation of the warehouse.
- 10.49 The work on the HEDNA has not included a detailed assessment of existing sites to assess the ongoing suitability to cater for the needs of this market segment, and address issues such as the shape of plots, access, environmental quality, adjacent uses, public transport accessibility etc. However we have sought to give some consideration to the potential to deliver a proportion of the assessed through the redevelopment of existing sites.
- 10.50 The map below indicates that existing warehousing space in the sub-region of over 9,000 sq.m is generally relatively well-located having regard to the strategic road network. However older stock is particularly concentrated within Coventry and in established estates in Rugby and Nuneaton. Urban sites in Coventry away from the Strategic Road Network may be less attractive, but there may be other locations such as Bermuda Business Park, Swift Valley or Atherstone where land can be recycled. Supply assessments for individual authorities might consider these issues further to further interrogate whether a proportion of the identified need could be met through existing sites. Equally there is potential for brownfield former manufacturing sites to come forwards, which in some circumstances may be suitable for large scale B8 development.²⁶ These issues can be picked up through local authorities' land availability assessments.

²⁶ We note for instance that Prologis Ryton and Hams Hall were brownfield sites.

Figure 10.2: Spatial Distribution of B8 Units of over 9,000 sq.m by Age



11. DRAWING CONCLUSIONS ON EMPLOYMENT LAND NEEDS

- 11.1 The outcomes of the modelling and recommended future requirements are considered below with a view to drawing conclusions on future employment land needs. The analysis includes consideration of an appropriate 'margin' for flexibility.

Offices

- 11.2 In most instances the VOA trend is negative based on the last ten years of net change. Significant losses in Warwick and Coventry have been seen historically and are extrapolated forwards in this scenario. However this unlikely to be realistic or desirable, given that PDR related losses will have converted poorer quality stock already and there is likely to be demand in the future from growing sectors. New City Centre office floorspace has been coming forwards in Coventry City Centre at Friargate since 2018 which has driven up the gross completions trend.
- 11.3 Given that office requirements tend to be closely linked to employment levels, it is recommended that in the round **the labour demand models best represent future needs for office floorspace**. The labour demand should best represent the future economic outlook, it is recommended that this be used for planning policy requirements.
- 11.4 There is some uncertainty about future levels of occupancy and utilisation of offices post pandemic and clarity regarding this may not be gained for some time. At the present time it would be reasonable to plan for the modelled needs, but it may be suitable to consider a lower rate of need based on the sensitivity model that assumes that homeworking trends permanently increase to reduce future densities by around 30% (Tables 10.7 / 10.8).
- 11.5 In reality there is some expectation that future office demand will be focused on higher quality provision that is more likely to manifest in stronger markets – notably Coventry and Warwick/Leamington – which is reflected to a degree in the labour demand figures.
- 11.6 It is of note that Friargate in Coventry City Centre – 2.35m sq.ft offices – would deliver substantially above the forecasts here and has the potential to support additional inward investment in City Centre as well as compensate for historic under delivery and past losses. Grade A space can attract inward investment and will likely capture greater share of take-up than historically. However wider office market trends point to lower overall demand in the future in the post pandemic period; with competition from other locations such as Birmingham City Centre and Arden Cross. It will be important to monitor market trends.

Industrial and Warehousing

- 11.7 The VOA trends for net floorspace changes are high in North Warwickshire and Rugby, driven by warehousing developments and demand. These are more pronounced in recent years influenced by strong demand for both manufacturing and warehousing/ logistics space. Furthermore trends in Nuneaton and Bedworth, Stratford-on-Avon and Coventry have also been positive recently – in part influenced by delivery on sites allocated through local plans.
- 11.8 The labour demand model produces a much narrower range and suggests that forecast industrial losses are outweighed by gains in warehousing needs in all areas – although in reality these may be overly influenced by national trends in manufacturing rather than representing actual floorspace requirements for industry, further compounded by a delinking of floorspace needs from jobs growth as capital inputs drive productivity to a greater extent than workforce growth does.
- 11.9 Neither the VOA or labour demand models are able to differentiate the strategic and more local industrial / warehouse requirements.
- 11.10 **The completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace** particularly for the short/medium-term. Comparing the completions data with other sources, monitoring by authorities suggests far higher levels of development have been achieved and therefore may be required in the future.
- 11.11 Consultation suggests that **whilst B8 demand is very strong, and that there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8** in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.

Adjustments for Margin

- 11.12 It is recommended a margin for flexibility be applied that recognises:
- Forecasting is not an exact science;
 - Locational and site size requirements vary; and
 - Potential for delay/slippage in sites coming forward.
- 11.13 The margin allows for the potential for delay in some sites coming forwards; an additional buffer so that in future demand is greater than forecasts it can be accommodated, and to reflect the right market in recent years with low current vacancy rates.

- 11.14 This is included as five years of gross completions for industrial / distribution²⁷ and 2 years for offices / R&D, as shown below. Five years is traditionally considered suitable as a margin however in the case of offices it is disproportionate to the scale of need modelled and likely to lead to an over inflation of figures.

Table 11.1 Margin for Flexibility (excl strategic B8) (Ha)

	Office/ R&D	Industrial exc B8 strategic	Total
N. Warwickshire	0.7	11.2	11.9
N. and Bedworth	0.2	9.1	9.3
Rugby	1.9	30.1	32.0
Stratford-on-Avon	-	33.2	33.2
Warwick	-	11.2	11.2
Coventry	4.6	29.5	34.1
Total	7.4	124.3	131.7

Source: Icen

- 11.15 For Stratford and Warwick, data issues mean no office margin is included. It may therefore be appropriate to treat figures as minima; but this should be informed by detailed consideration of the office stock and trends in losses.

Replacement Demand

- 11.16 Replacement demand factors make provision for losses of future stock, assuming that past patterns of losses continue. It is normal that some stock is lost as it ages and premises become redundant. This can be due to changing industry patterns or because firms simply need new premises. Differences between losses and gains as well as market feedback can be useful indicators of the need for replacement demand. The sector by sector matters are discussed below.

Offices

- 11.17 Considerable losses have occurred in Coventry through Change of Use under Permitted Development Rights (PDR). The VOA negative net trend is considerable in Coventry and to a lesser extent in Warwick. The Friargate scheme is an ambitious proposal for Coventry that can both compensate for some losses of older stock and attract new investment. Otherwise, Icen is of the view that specific provision for replacement demand of offices is not warranted in the current market.

Industrial and Warehousing

- 11.18 If a positive approach is taken to provision overall, through the use of gross completions, there is no need to make further inclusion for replacement demand. If net (VOA) trends were used then a considerable additional allowance would be required. Making a judgement on the rate of replacement of older stock (such as 50% of historic losses) preferably requires a detailed understanding of the

²⁷ Increased on a pro-rata basis for projections to 2050

pattern, type and nature of losses in local areas which is better suited to individual area ELRs. Using the gross completions does assume that past losses will to an extent continue and some of the forecast need may occur on recycled existing industrial premises.

Recommendations

11.19 Taking into account the narrative above the following recommendations are made in regard to future needs. These draw on:

- labour demand modelling for office needs;
- gross completions trends for industrial and warehousing; and
- margin.

Table 11.2 Employment Land Needs 2021-2041, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.7	621.9	659.6	606

Source: VOA / CE/lceni

Table 11.3 Employment Land Needs 2021-2050, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	49.4	901.8	951.3	709

Source: VOA / CE/lceni

Meeting the Strategic B8 Need

11.20 We next turn to consider what approach should be used in meeting the strategic B8 need identified.

11.21 The PPG outlines that strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones). There are clearly multiple technical issues to be considered in assessing specific prospective sites including environmental and highways impacts, impacts on Green Belt or the landscape, through to power requirements etc. The intention of this report is therefore not to recommend specific locations, but to provide guidance which the local authorities in the sub-region can use in considering what sites are appropriate.

11.22 We consider that key locational considerations include:

- Road accessibility – sites should be located where they can be accessed from the strategic road network (motorway or significant A-road) which has capacity (or the potential to improve capacity) to support the proposed development. Regard in this respect should be had to planned improvements;
- Power supply – sites should be located where there is potential to access sufficient power. This is an important consideration given the potential for increased automation, electrification of vehicle fleets, and systems for chilled goods. Some power could however be generated through modern buildings with solar panels/ photovoltaics.
- Proximity to Rail Terminals – as explained co-location of warehousing on sites with rail terminals is becoming less relevant, but there are potential sustainability benefits and cost savings to transporting goods long distance by rail. The potential for rail access will also help to future proof investments. Sites close to existing / planned terminals with capacity should be assessed more positively.
- Labour availability – accessibility to labour is an important consideration. Locations which can draw on a wider labour pool should be assessed more positively. This will include urban areas within the sub-region, as well as outside of it – including Birmingham for instance. Regard should be had to the accessibility of locations by public transport, particularly from deprived areas and those with available labour market capacity, and the ability of employment nodes with a greater density of employment to sustain regular public transport services.
- Neighbouring activities – supply should not be located in close proximity to residential areas (or accessed through them), with suitable locations able to support 24/7 operations. They should be away from incompatible land uses. Locations should be able to accommodate high bay warehousing of at least 20m height without unacceptable impacts.

11.23 With this set of considerations in mind we would recommend that a geographical spread of commercially attractive sites is identified and brought forward, with the aim of catering for the requirements of occupiers with different locational requirements and avoiding issues of over-concentration which can create localised issues of labour market competition between businesses.

11.24 We consider on this basis that key potential corridors within the sub-region which could accommodate strategic B8 development include:

- M42/A446 Corridor – there is an existing concentration of B8 development in this area, which benefits from a rail terminal at Hams Hall and is proximate to a concentration of population in Birmingham including deprived areas in East Birmingham;
- M6 Corridor – this corridor includes Junctions 2 and 3 on the northern side of Coventry, as well as Junction 1 at Rugby. Coventry is a large population centre which includes areas of deprivation.
- M45/A45 Corridor – this corridor has seen the successful delivery of B8 development at Prologis Ryton, which is close to Coventry as a main population centre, with further land with planning permission at Symmetry Park Rugby and Coventry and Warwickshire Gateway. There is a rail terminal at DIRFT.
- A5 Corridor – this Corridor includes rail terminals at Hams Hall and DIRFT and connects to the M42, M6 and M1. There are however potential issues of capacity and the prospect/funding of dualling of the road. Parts of the corridor fall outside of the Green Belt.

11.25 Existing concentrations of development indicates that the above are attractive locations for strategic B8 development and relate well to the Golden Triangle. However there is the potential that over concentration of development in these areas in the north/west of the sub-region could create pressures particularly in terms of the highways network and labour market (subject to detailed assessment). Icenl therefore consider that there is the potential for other corridors within the sub-region, particularly in South Warwickshire, to play a greater potential role in providing strategic B8 development than they have historically. These include:

- M40 Corridor – there has been strategic B8 development brought forwards at Banbury and Bicester, highlighting the potential of this corridor. There is potential to consider provision at or close to junctions on this corridor within the sub-region.
- A46 Corridor – there is limited strategic B8 development on this corridor with potential that it could play some role in the future.

11.26 We would therefore envisage a continuing focus of strategic B8 growth in the north and west of the sub-region, but with a greater potential role for South Warwickshire than seen historically. Given the need for Green Belt development if the needs identified are to be met, it would be advisable to

coordinate assessment of suitable sites at a sub-regional level to integrate relevant consideration including landscape harm, power capacity, and seek to limit harm to Green Belt purposes. It would not be appropriate in our view to simply replicate past development patterns in respect of the spatial distribution of development by local authority.

- 11.27 Planning for strategic B8 development is inevitably an area where it will be important that the local authorities in the sub-region continue to collaborate.

PART D: MIX OF HOMES NEEDED

12. SIZES AND TYPES OF HOMES NEEDED

12.1 This section considers the appropriate mix of housing across the study area, with a particular focus on the sizes of homes required in different tenure groups for new development. This section looks at a range of statistics in relation to families (generally described as households with dependent children) before moving on to look at how the number of households in different age groups are projected to change moving forward.

Background Data

12.2 The number of families in Coventry-Warwickshire (defined for the purpose of this assessment as any household which contains at least one dependent child) totalled 104,800 as of the 2011 Census, accounting for 29% of households; this proportion is similar to the regional and national average.

12.3 This analysis has drawn on 2011 Census data which is now somewhat out-of-date. However, it would be expected that general patterns between areas will remain broadly the same (i.e. areas with greater proportions of family households in 2011, will still be expected to have greater proportions now). New (2021) Census data should start to filter through later in 2022, which will allow for this analysis to be updated.

Table 12.1 Households with dependent children (2011)

		Married couple	Cohabiting couple	Lone parent	Other household (with dependents)	All other households (no dependent children)	Total	Total with dependent children
Coventry-Warwickshire	No.	55,464	14,155	26,433	8,785	254,760	359,597	104,837
	%	15.4%	3.9%	7.4%	2.4%	70.8%	100.0%	29.2%
West Midlands	%	15.4%	4.3%	7.5%	2.9%	69.8%	100.0%	30.2%
England	%	15.3%	4.0%	7.1%	2.6%	70.9%	100.0%	29.1%

Source: Census (2011)

12.4 The table below shows the same information for each local authority. The analysis shows relatively few family households in Stratford-on-Avon (26%) and higher proportions in Coventry and Nuneaton & Bedworth; Coventry also sees a higher proportion of lone parent households than other locations.

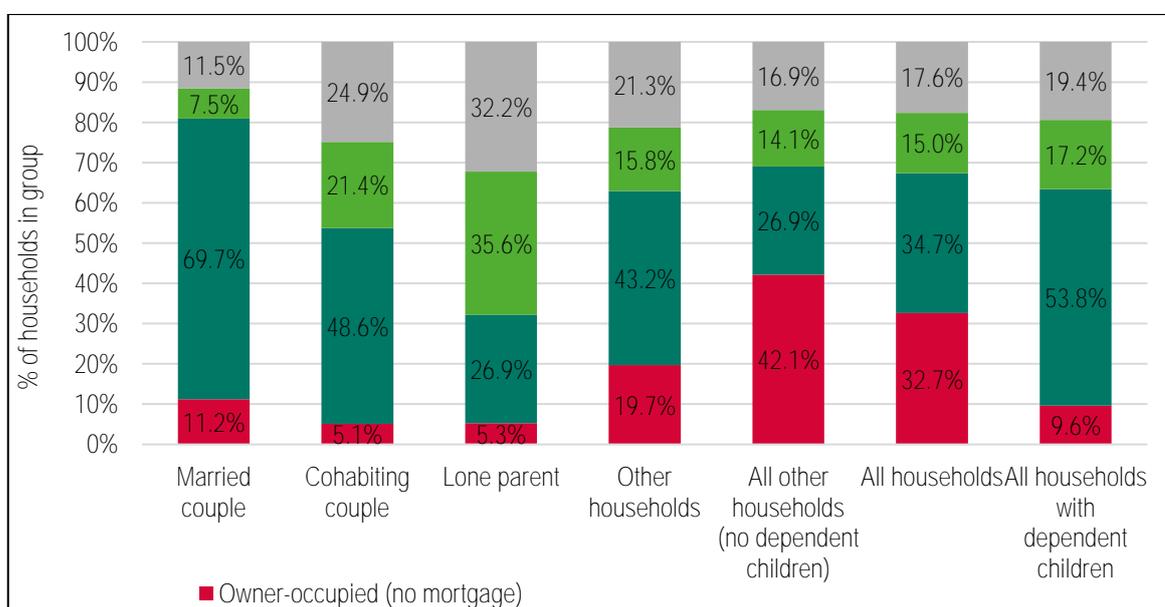
Table 12.2 Households with Dependent Children (2011) – local authorities

	Married couple	Cohabiting couple	Lone parent	Other household (with dependents)	All other households (no dependent children)	Total	Total with dependent children
Coventry	14.3%	3.9%	9.6%	3.2%	69.0%	100.0%	31.0%
North Warwickshire	15.3%	5.0%	5.8%	2.1%	71.6%	100.0%	28.4%
Nuneaton & Bedworth	15.4%	5.0%	7.5%	2.3%	69.8%	100.0%	30.2%
Rugby	16.9%	4.3%	6.4%	2.2%	70.2%	100.0%	29.8%
Stratford-on-Avon	16.7%	3.1%	4.9%	1.5%	73.8%	100.0%	26.2%
Warwick	15.8%	3.1%	5.7%	2.1%	73.4%	100.0%	26.6%
Warwickshire	16.1%	4.0%	6.1%	2.0%	71.9%	100.0%	28.1%
Coventry-Warwickshire	15.4%	3.9%	7.4%	2.4%	70.8%	100.0%	29.2%

Source: Census (2011)

12.5 The figure below shows the current tenure of households with dependent children. There are some considerable differences by household type with lone parents having a very high proportion living in the social rented sector and also in private rented accommodation. Only 32% of lone parent households are owner-occupiers compared with 81% of married couples with children.

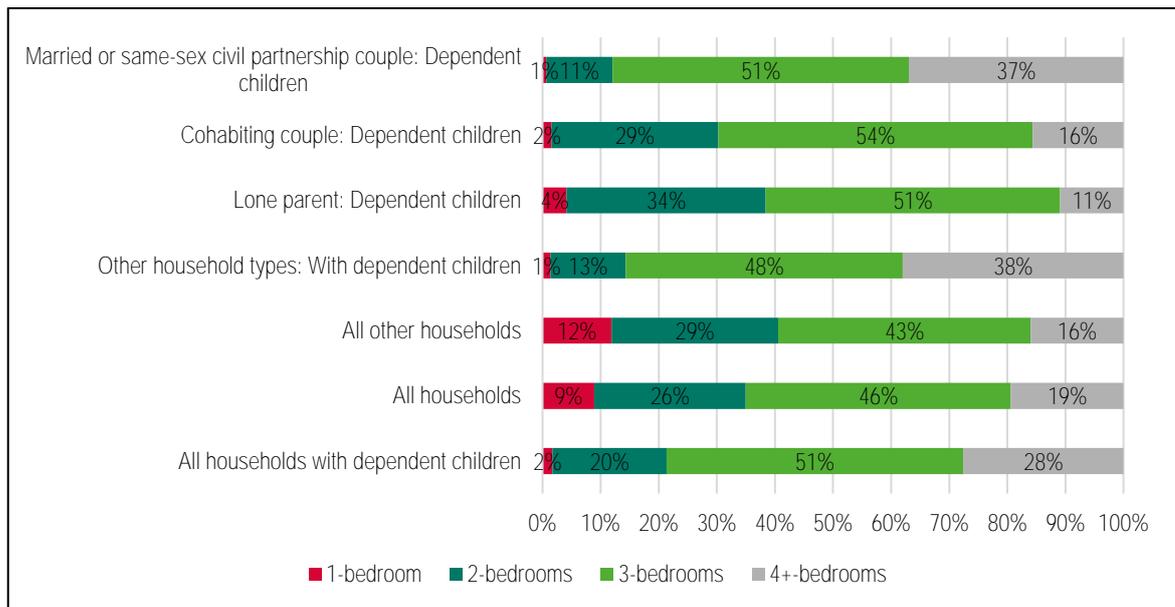
Figure 12.1: Tenure of households with dependent children (2011) – Coventry-Warwickshire



Source: Census (2011)

12.6 The figure below shows the number of bedrooms for family households at the point of the 2011 Census. The analysis shows the differences between married, cohabiting and lone parent families. Across the study area, the tendency is for family households to occupy 3-bedroom housing with varying degrees of 2-and 4+-bedroom properties depending on the household composition. The data also, unsurprisingly, highlights the small level of 1-bed stock occupied by families across the board. As a result, we could expect continued demand for 3+-bedroom homes from family households.

Figure 12.2 Number of Bedrooms by Family Household Type, 2011 – Coventry-Warwickshire



Source: Census (2011)

The Mix of Housing

- 12.7 A model has been developed that starts with the current profile of housing in terms of size (bedrooms) and tenure. Within the data, information is available about the age of households and the typical sizes of homes they occupy. By using demographic projections linked to the local housing need calculated through the standard method, it is possible to see which age groups are expected to change in number, and by how much.
- 12.8 On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it is therefore possible to assess the profile of housing needed over the assessment period (taken for the purposes of analysis to be the 2022-32 period).
- 12.9 An important starting point is to understand the current balance of housing in the area – the table below profiles the sizes of homes in different tenure groups across areas. The data shows a generally similar profile of housing in each tenure group when compared with the regional and national position. Observations about the current mix feed into conclusions about future mix later in this section.

Table 12.3 Number of Bedrooms by Tenure, 2011

		Coventry- Warwickshire	West Midlands	England
Owner-occupied	1-bedroom	2%	2%	4%
	2-bedrooms	21%	20%	23%
	3-bedrooms	52%	54%	48%
	4+-bedrooms	25%	24%	25%
	Total	100%	100%	100%
Social rented	1-bedroom	31%	29%	31%
	2-bedrooms	35%	34%	34%
	3-bedrooms	31%	33%	31%
	4+-bedrooms	3%	4%	4%
	Total	100%	100%	100%
Private rented	1-bedroom	16%	18%	23%
	2-bedrooms	39%	37%	39%
	3-bedrooms	34%	36%	28%
	4+-bedrooms	12%	10%	10%
	Total	100%	100%	100%

Source: Census (2011)

- 12.10 The table below shows the same information for each of the local authorities – this shows broadly similar patterns across areas although there are a few notable differences; this includes a high proportion of 4+-bedroom market homes in Stratford-on-Avon, lower proportions of 1-bedroom social rented homes in Stratford-on-Avon and North Warwickshire.

Table 12.4 Number of Bedrooms by Tenure, 2011 – local authorities in Coventry-Warwickshire

		Coven- try	N Warwks	N & B	Rugby	SoA	Warwick
Owner-occupied	1-bedroom	2%	2%	2%	2%	3%	3%
	2-bedrooms	21%	19%	21%	20%	19%	22%
	3-bedrooms	60%	55%	57%	49%	40%	43%
	4+-bedrooms	17%	24%	20%	29%	38%	32%
	Total	100%	100%	100%	100%	100%	100%
Social rented	1-bedroom	34%	26%	33%	30%	20%	31%
	2-bedrooms	34%	34%	31%	34%	44%	37%
	3-bedrooms	29%	37%	33%	33%	32%	29%
	4+-bedrooms	4%	3%	3%	3%	4%	3%
	Total	100%	100%	100%	100%	100%	100%
Private rented	1-bedroom	14%	14%	14%	17%	15%	22%
	2-bedrooms	37%	37%	39%	39%	41%	42%
	3-bedrooms	37%	39%	40%	33%	30%	22%
	4+-bedrooms	12%	10%	7%	11%	14%	14%
	Total	100%	100%	100%	100%	100%	100%

Source: Census (2011)

Overview of Methodology

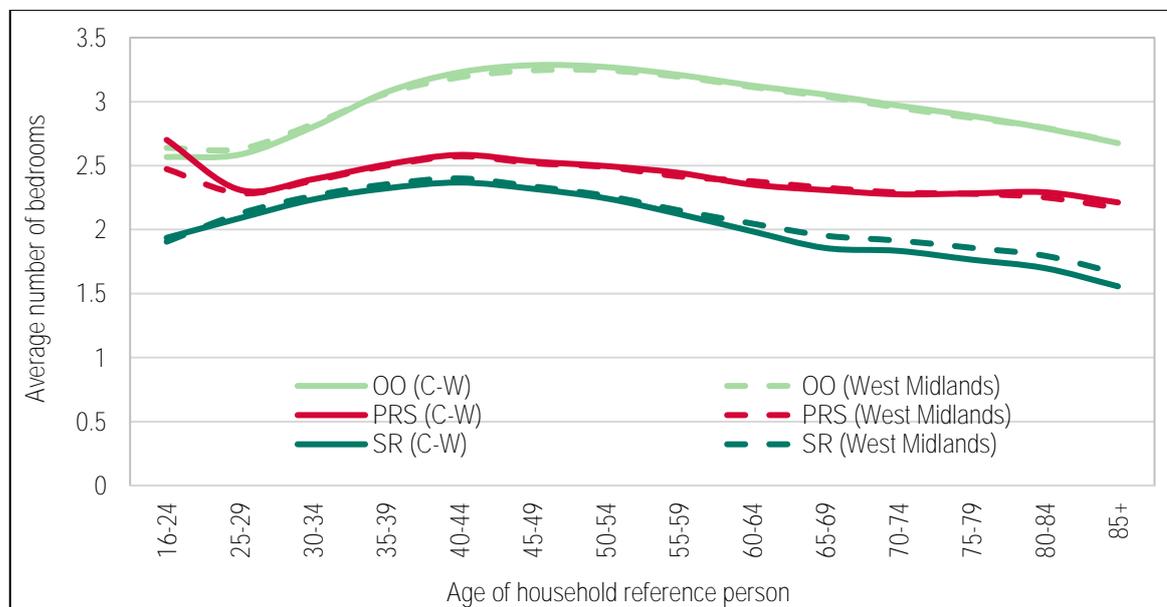
- 12.11 The method to consider future housing mix looks at the ages of the Household Reference Persons and how these are projected to change over time. The sub-sections to follow describe some of the key analysis.

Understanding How Households Occupy Homes

- 12.12 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households into a suggested profile for additional housing to be provided. The main reason for this is that in the market sector, households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.
- 12.13 The size of housing which households occupy relates more to their wealth and age than the number of people they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a 4-bedroom home as long as they can afford it, and hence projecting an increase in single person households does not automatically translate into a need for smaller units.
- 12.14 That said, issues of supply can also impact occupancy patterns, for example it may be that a supply of additional smaller bungalows (say 2-bedrooms) would encourage older people to downsize but in the absence of such accommodation these households remain living in their larger accommodation.
- 12.15 The issue of choice is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) where households are allocated properties which reflect the size of the household, although there will still be some level of under-occupation moving forward with regard to older person and working households who may be able to under-occupy housing (e.g. those who can afford to pay the spare room subsidy ('bedroom tax')).
- 12.16 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups. The data for this analysis has been formed from a commissioned table by ONS (Table CT0621 which provides relevant data for all local authorities in England and Wales from the 2011 Census).
- 12.17 The figure below shows an estimate of how the average number of bedrooms varies by different ages of HRP and broad tenure group for Coventry-Warwickshire and the West Midlands. In the owner-occupied sector the average size of accommodation rises over time to typically reach a peak around the age of 45-50; a similar pattern (but with smaller dwelling sizes and an earlier peak) is

seen in both the social and private rented sector. After peaking, the average dwelling size decreases – as typically some households downsize as they get older.

Figure 12.3 Average Bedrooms by Age and Tenure in Coventry-Warwickshire and the West Midlands



Source: Census (2011)

12.18 Replicating the existing occupancy patterns at a local level would however result in the conclusions being skewed by the existing housing profile. On this basis a further model has been developed that applies regional occupancy assumptions for the West Midlands region. Assumptions are applied to the projected changes in Household Reference Person by age discussed below.

12.19 The analysis has been used to derive outputs for three broad categories. These are:

- **Market Housing** – which is taken to follow the occupancy profiles in the owner-occupied sector;
- **Affordable Home Ownership** – which is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government’s desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting); and
- **Rented Affordable Housing** – which is taken to follow the occupancy profile in the social rented sector. The affordable sector in the analysis to follow would include social and affordable rented housing.

Changes to Households by Age

12.20 The table below presents the projected change in households by age of household reference person, this clearly shows particularly strong growth as being expected in older age groups (and to some

extent some younger age groups e.g. those aged up to 29). The number of households headed by someone aged 50-59 is projected to see a small decline over the period studied.

Table 12.5 Projected Change in Household by Age of HRP in Coventry-Warwickshire – trend-based projection

	2022	2032	Change in Households	% Change
16-24	14,994	18,176	3,182	21.2%
25-29	23,540	28,690	5,150	21.9%
30-34	33,791	36,785	2,994	8.9%
35-39	34,159	34,817	658	1.9%
40-44	34,011	37,959	3,948	11.6%
45-49	33,349	35,616	2,266	6.8%
50-54	37,864	34,694	-3,170	-8.4%
55-59	38,059	34,463	-3,596	-9.4%
60-64	32,515	37,322	4,807	14.8%
65-69	28,655	37,100	8,445	29.5%
70-74	29,354	31,396	2,042	7.0%
75-79	25,588	26,011	424	1.7%
80-84	18,169	24,355	6,185	34.0%
85 & over	17,284	21,939	4,655	26.9%
Total	401,332	439,322	37,990	9.5%

Source: Demographic Projections

Initial Modelled Outputs

- 12.21 By following the methodology set out above and drawing on the sources shown, a series of outputs have been derived to consider the likely size requirement of housing within each of the three broad tenures at a local authority level. Analysis takes account of both local and regional occupancy patterns. The data linking to local occupancy will to some extent reflect the role and function of the local area, whilst the regional data will help to establish any particular gaps (or relative surpluses) of different sizes/tenures of homes when considered in a wider context.
- 12.22 The analysis for rented affordable housing can also draw on data from the local authority Housing Register with regards to the profile of need. The data has been taken from the Local Authority Housing Statistics (“LAHS”) and shows a pattern of need which is focussed on 1- and 2-bedroom homes but also showing approaching a quarter of households as requiring 3+- bedroom homes (over a third in Nuneaton & Bedworth).

Table 12.6 Breakdown of Housing Register by Current Bedroom Need, 2021

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	45%	30%	19%	6%
North Warwickshire	38%	38%	20%	4%
Nuneaton & Bedworth	22%	37%	35%	7%
Rugby	52%	19%	13%	16%
Stratford-on-Avon	57%	32%	9%	3%
Warwick	63%	24%	10%	4%
Warwickshire	50%	31%	15%	4%
Coventry-Warwickshire	47%	30%	17%	5%

Source: Local Authority Housing Statistics, 2020

- 12.23 The table below shows the modelled outputs of need by dwelling size in the three broad tenures. The table is provided by linking to local and regional occupancy patterns with the data taking an average of the two positions.

Table 12.7 Modelled Mix of Housing by Size and Tenure in Coventry-Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	3%	26%	54%	18%
Affordable home ownership	18%	40%	31%	11%
Affordable housing (rented)	32%	35%	30%	3%

Source: Housing Market Model

Adjustments for Under-Occupation and Overcrowding

- 12.24 The analysis above sets out the potential need for housing if occupancy patterns remained the same as they were in 2011 (with differences from the current stock profile being driven by demographic change). It is however worth also considering that the 2011 profile will have included households who are overcrowded (and therefore need a larger home than they actually live in) and also those who under-occupy (have more bedrooms than they need).
- 12.25 Whilst it would not be reasonable to expect to remove all under-occupancy (particularly in the market sector) it is the case that in seeking to make the most efficient use of land it would be prudent to look to reduce this over time. Indeed, in the future there may be a move away from current (2011) occupancy patterns due to affordability issues (or eligibility in social rented housing) as well as the type of stock likely to be provided (potentially a higher proportion of flats). Further adjustments to the modelled figures above have therefore been made to take account of overcrowding and under-occupancy (by tenure).
- 12.26 The table below shows a cross-tabulation of a household's occupancy rating and the number of bedrooms in their home (for owner-occupiers), in particular, this shows a higher number of households with at least 2 spare bedrooms who are living in homes with 3 or more bedrooms. There are also a small number of overcrowded households. Overall, in the owner-occupied sector in 2011,

there were 205,200 households with some degree of under-occupation and just 4,600 overcrowded households. For clarity the figure used in the tables below are:

- +2 – household has two or more spare bedrooms
- +1 – household has one spare bedroom
- 0 – household has the same number of bedrooms as required for family members
- -1 – household is overcrowded with one bedroom too few
- -2 – household is overcrowded with at least two bedroom too few

Table 12.8 Cross-tabulation of occupancy rating and number of bedrooms (owner-occupied sector) – Coventry-Warwickshire

Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2	0	0	70,660	47,493	118,153
+1	0	39,239	37,507	10,328	87,074
0	4,850	9,674	15,772	2,251	32,547
-1	312	1,243	1,959	393	3,907
-2	104	163	304	102	673
TOTAL	5,266	50,319	126,202	60,567	242,354

Source: Census (2011)

12.27 For completeness the tables below show the same information for the social and private rented sectors. In both cases there are more under-occupying households than overcrowded, but differences are less marked than seen for owner-occupied housing.

Table 12.9 Cross-tabulation of occupancy rating and number of bedrooms (social rented sector) – Coventry-Warwickshire

Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2	0	0	5,183	499	5,682
+1	0	9,392	5,204	732	15,328
0	15,423	8,097	5,139	468	29,127
-1	1,043	1,284	934	57	3,318
-2	132	135	107	9	383
TOTAL	16,598	18,908	16,568	1,764	53,838

Source: Census (2011)

Table 12.10 Cross-tabulation of occupancy rating and number of bedrooms (private rented sector) – Coventry-Warwickshire

Occupancy rating	Number of bedrooms				TOTAL
	1-bed	2-bed	3-bed	4+-bed	
+2	0	0	8,683	2,692	11,375
+1	0	14,461	6,662	3,391	24,514
0	8,838	8,581	4,885	1,016	23,320
-1	1,137	1,254	969	199	3,559
-2	160	221	202	54	637
TOTAL	10,135	24,517	21,402	7,351	63,405

Source: Census (2011)

- 12.28 In using this data in the modelling an adjustment is made to move some of those who would have been picked up in the modelling as under-occupying into smaller accommodation. Where there is under-occupation by 2 or more bedrooms, the adjustment takes 25% of this group and assigns to a '+1' occupancy rating and a further 12.5% (i.e. an eighth) to a '0' rating. For households with one spare bedroom, 12.5% are assigned to a '0' rating (with the others remaining as '+1'). These do need to be recognised as assumptions, but can be seen to be reasonable as they do retain some degree of under-occupation (which is likely) but does also seek to model a better match between household needs and the size of their home. For overcrowded households a move in the other direction is made, in this case households are moved up as many bedrooms as is needed to resolve the problems.
- 12.29 The adjustments for under-occupation and overcrowding lead to the suggested mix as set out in the following table. It can be seen that this tends to suggest a smaller profile of homes as being needed (compared to the initial modelling) with the biggest change being in the market sector – which was the sector where under-occupation is currently most notable.

Table 12.11 Adjusted Modelled Mix of Housing by Size and Tenure – Coventry-Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	37%	41%	12%
Affordable home ownership	21%	43%	27%	10%
Affordable housing (rented)	34%	37%	25%	4%

Source: Housing Market Model (with adjustments)

- 12.30 The tables below show the same outputs for each of the local authorities. Generally the figures show similar patterns, although there are variations due to the current stock profile, projected future demographic change and levels of over- and under-occupation.

Table 12.12 Adjusted Modelled Mix of Housing by Size and Tenure – Coventry

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	11%	37%	42%	11%
Affordable home ownership	21%	46%	18%	15%
Affordable housing (rented)	32%	38%	25%	5%

Source: Housing Market Model (with adjustments)

Table 12.13 Adjusted Modelled Mix of Housing by Size and Tenure – North Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	41%	43%	6%
Affordable home ownership	23%	36%	34%	7%
Affordable housing (rented)	34%	36%	26%	4%

Source: Housing Market Model (with adjustments)

Table 12.14 Adjusted Modelled Mix of Housing by Size and Tenure – Nuneaton & Bedworth

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	11%	37%	42%	10%
Affordable home ownership	21%	40%	31%	8%
Affordable housing (rented)	37%	33%	25%	4%

Source: Housing Market Model (with adjustments)

Table 12.15 Adjusted Modelled Mix of Housing by Size and Tenure – Rugby

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	8%	31%	44%	17%
Affordable home ownership	20%	38%	32%	11%
Affordable housing (rented)	34%	35%	27%	4%

Source: Housing Market Model (with adjustments)

Table 12.16 Adjusted Modelled Mix of Housing by Size and Tenure – Stratford-on-Avon

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	11%	38%	40%	12%
Affordable home ownership	22%	42%	28%	8%
Affordable housing (rented)	35%	38%	23%	3%

Source: Housing Market Model (with adjustments)

Table 12.17 Adjusted Modelled Mix of Housing by Size and Tenure – Warwick

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	39%	39%	11%
Affordable home ownership	24%	44%	25%	8%
Affordable housing (rented)	35%	36%	25%	4%

Source: Housing Market Model (with adjustments)

Indicative Targets for Different Sizes of Properties by Tenure

12.31 The analysis below provides some indicative targets for different sizes of home (by tenure). The conclusions take account of a range of factors, including the modelled outputs and an understanding of the stock profile in different locations. The analysis (for rented affordable housing) also draws on the Housing Register data as well as taking a broader view of issues such as the flexibility of homes to accommodate changes to households (e.g. the lack of flexibility offered by a 1-bedroom home for a couple looking to start a family).

Social/Affordable Rented Housing

12.32 Bringing together the above, a number of factors are recognised. This includes recognising that it is unlikely that all affordable housing needs will be met and that it is possible that households with a need for larger homes will have greater priority (as they are more likely to contain children). That said, there is also a possible need for 1-bedroom social housing arising due to homelessness (typically homeless households are more likely to be younger single people); that said this group might also be expected to need other forms of accommodation (e.g. foyer or supported housing). In taking any recommendations forward, the Councils will therefore need to consider any specific issues in their local area.

12.33 As noted, the conclusions also consider the Housing Register, but recognises that this will be based on a strict determination of need using the bedroom standard; there will be some households able to afford a slightly larger home or who can claim benefits for a larger home than they strictly need (i.e. are not caught by the spare room subsidy ('bedroom tax') – this will include older person households). The conclusions also take account of the current profile of housing in this sector (which for example shows a varying proportion of 1-bedroom homes in the current stock across areas).

12.34 In taking account of the modelled outputs, the Housing Register and the discussion above, it is suggested that the following mix of social/affordable rented housing (which is close to the modelled outputs) would be appropriate.

Table 12.18 Suggested Mix of Social/Affordable Rented Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	30%	35%	25%	10%
North Warwickshire	30%	35%	25%	10%
Nuneaton & Bedworth	25%	35%	30%	10%
Rugby	35%	30%	20%	15%
Stratford-on-Avon	40%	35%	20%	5%
Warwick	40%	35%	20%	5%
Warwickshire	35%	35%	20%	10%
Coventry-Warwickshire	35%	35%	20%	10%

Source: Conclusions drawn on a variety of sources

Affordable Home Ownership

- 12.35 In the affordable home ownership and market sectors a profile of housing that closely matches the outputs of the modelling is suggested (with some adjustments to take account of student households in Coventry). It is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. Based on this analysis, it is suggested that the following mix of affordable home ownership would be appropriate, and it can be noted that there really is very little difference in the recommendations across areas.
- 12.36 It can be seen that the profile of housing in this sector is generally for slightly larger homes than for the social/affordable rented sector – this will in part reflect the fact that some degree of under-occupation would be allowed in such homes. For 1-bedroom units, it needs to be recognised that the figures are driven by the modelling linked to demographic change; again Councils may need to consider if the figures are appropriate on a local context. For example, in some areas Registered Providers find difficulties selling 1-bedroom affordable home ownership homes and therefore the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation.

Table 12.19 Suggested Mix of Affordable Home Ownership Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	20%	45%	25%	10%
North Warwickshire	20%	40%	30%	10%
Nuneaton & Bedworth	20%	40%	30%	10%
Rugby	20%	40%	30%	10%
Stratford-on-Avon	20%	45%	25%	10%
Warwick	20%	45%	25%	10%
Warwickshire	20%	40%	30%	10%
Coventry-Warwickshire	20%	45%	25%	10%

Source: Conclusions drawn on a variety of sources

Market Housing

- 12.37 Finally, in the market sector, a balance of dwellings is suggested that takes account of both the demand for homes and the changing demographic profile (as well as observations about the current mix when compared with other locations and also the potential to slightly reduce levels of under-occupancy). This sees a slightly larger recommended profile compared with other tenure groups – again there is little variation across areas.

Table 12.20 Suggested Mix of Market Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	10%	40%	40%	10%
North Warwickshire	10%	35%	45%	10%
Nuneaton & Bedworth	10%	35%	45%	10%
Rugby	10%	30%	45%	15%
Stratford-on-Avon	10%	35%	40%	15%
Warwick	10%	40%	40%	10%
Warwickshire	10%	35%	45%	10%
Coventry-Warwickshire	10%	40%	40%	10%

Source: Conclusions drawn on a variety of sources

- 12.38 Although the analysis has quantified this on the basis of the market modelling and an understanding of the current housing market, it does not necessarily follow that such prescriptive figures should be included in the plan making process (although it will be useful to include an indication of the broad mix to be sought across the study area) – demand can change over time linked to macro-economic factors and local supply. Policy aspirations could also influence the mix sought.
- 12.39 The suggested figures can be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area. The recommendations can also be used as a set of guidelines to consider the appropriate mix on larger development sites, and the Councils could expect justification for a housing mix on such sites which significantly differs from that modelled herein. Site location and area character are also however relevant considerations the appropriate mix of market housing on individual development sites.

Smaller-area Housing Mix

- 12.40 The analysis above has focussed on overall study area-wide and local authority needs with conclusions very much at the strategic level. It should however be recognised that there will be variations in the need within areas due the different role and function of a location and the specific characteristics of local households (which can also vary over time). This report does not seek to look at smaller-area needs, and this would be best suited to individual projects for local authorities; however, below are some points for consideration when looking at needs in any specific location.
- a) Whilst there will be differences in the stock profile in different locations this should not necessarily be seen as indicating particular surpluses or shortfalls of particular types and sizes of homes;
 - b) As well as looking at the stock, an understanding of the role and function of areas is important. For example, higher priced rural areas are typically sought by wealthier families and therefore such areas would be expected to provide a greater proportion of larger homes;

c) That said, some of these areas will have very few small/cheaper stock and so consideration needs to be given to diversifying the stock;

d) The location/quality of sites will also have an impact on the mix of housing. For example, brownfield sites in the centre of towns may be more suited to flatted development (as well as recognising the point above about role and function) whereas a rural site on the edge of an existing village may be more appropriate for family housing. Other considerations (such as proximity to public transport) may impact on a reasonable mix at a local level.

12.41 The Councils should also monitor what is being built to ensure that a reasonable mix is provided in a settlement overall.

12.42 Additionally, in the affordable sector it may be the case that Housing Register data for a smaller area identifies a shortage of housing of a particular size/type which could lead to the mix of housing being altered from the overall suggested requirement

Built Form

12.43 A final issue is a discussion of the need/demand for different built-forms of homes. In particular this discussion focusses on bungalows and the need for flats vs. houses.

Bungalows

12.44 The sources used for analysis in this report make it difficult to quantify a need/demand for bungalows in the HMA and constituent authorities as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. Data from the Valuation Office Agency (VOA) does however provide estimates of the number of bungalows (by bedrooms) although no tenure split is available.

12.45 The table below shows a notable proportion of homes are bungalows (7% of all flats and houses) with over half of these having 2-bedrooms (and most of the rest having 3-bedrooms); a slightly higher proportion (9%) of homes across England are bungalows.

Table 12.21 Number of dwellings by property type and number of bedrooms (March 2020) – Coventry-Warwickshire

	Number of bedrooms					All
	1	2	3	4+	Not Known	
Bungalow	3,720	14,750	6,600	1,540	130	26,690
Flat/Maisonette	31,450	33,230	2,690	1,870	660	69,890
Terraced house	1,640	40,880	80,250	6,700	520	129,970
Semi-detached house	320	15,670	77,660	8,700	370	102,700
Detached house	140	2,470	26,080	40,840	670	70,200
All flats/houses	37,270	107,000	193,280	59,650	2,350	399,450
Annexe	-	-	-	-	-	560
Other	-	-	-	-	-	1,710
Unknown	-	-	-	-	-	6,260
All properties	-	-	-	-	-	407,990

Source: Valuation Office Agency

12.46 For individual local authorities the proportion of the stock that is bungalows is shown below. Generally across the County, the proportion does not vary much, going from 11.2% in Charnwood, up to 14.0% in Hinckley & Bosworth:

- Coventry – 4.0%;
- North Warwickshire – 8.7%;
- Nuneaton & Bedworth – 7.3%;
- Rugby – 8.9%;
- Stratford-on-Avon – 10.0%;
- Warwick – 6.6%;
- Warwickshire – 8.2%; and
- Coventry-Warwickshire – 6.7%

12.47 In general, discussions with local estate agents find that there is a demand for bungalows and in addition, analysis of survey data (in other locations) points to a high demand for bungalows (from people aged 65 and over in particular).

12.48 Bungalows are often the first choice for older people seeking suitable accommodation in later life and there is generally a high demand for such accommodation when it becomes available (this is different from specialist accommodation for older people which would have some degree of care or support).

12.49 As a new build option, bungalows are often not supported by either house builders or planners (due to potential plot sizes and their generally low densities). There may, however, be instances where bungalows are the most suitable house type for a particular site; for example, to overcome objections about dwellings overlooking existing dwellings or preserving sight lines.

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- 12.50 There is also the possibility of a wider need/demand for retirement accommodation. Retirement apartments can prove very popular if they are well located in terms of access to facilities and services, and environmentally attractive (e.g. have a good view). However, some potential purchasers may find high service charges unacceptable or unaffordable and new build units may not retain their value on re-sale.
- 12.51 Overall, the Councils should consider the potential role of bungalows as part of the future mix of housing. Such housing may be particularly attractive to older owner-occupiers (many of whom are equity-rich) which may assist in encouraging households to downsize. However, the downside to providing bungalows is that they are often relatively land intensive.
- 12.52 Bungalows are likely to see a particular need and demand in the market sector and also for rented affordable housing (for older people as discussed in the next section of the report). Bungalows are likely to particularly focus on 2-bedroom homes, including in the affordable sector where such housing may encourage households to move from larger 'family-sized' accommodation (with 3+-bedrooms).

Flats vs. Houses

- 12.53 Although there are some 1-bedroom houses and 3-bedroom flats, it is considered that the key discussion on built-form will be for 2-bedroom accommodation, where it might be expected that there would be a combination of both flats and houses. At a national level, 81% of all 1-bedroom homes are flats, 35% of 2-bedroom homes and just 4% of homes with 3-bedrooms.
- 12.54 The table below shows (for 2-bedroom accommodation) the proportion of homes by tenure that are classified as a flat, maisonette or apartment in Coventry-Warwickshire and England. This shows a total of 30% of all bedroom homes as flats and would potentially point to the majority of 2-bedroom homes in the future also being houses. The analysis does however show a higher proportion of flats in the social and private rented sectors. It is considered that greater emphasis should be given to mix by dwelling size than type recognising the potential for built-form to vary in different locations.
- 12.55 This analysis is based on considering the current built-form in different tenures. Any decisions about the types of dwelling to be provided will need to take account of factors such as households type of those likely to occupy dwellings (where for example households with children will be more suited to a house than a flat). However, site characteristics may also play a role in deciding the most suitable built-form (e.g. city/town centre developments may be more suited to flats).

Table 12.22 Proportion of 2-bedroom homes that are a flat, maisonette or apartment (by tenure)

	Owner-occupied	Social rented	Private rented	All (2-bedroom)
Coventry	21%	51%	42%	34%
North Warwickshire	9%	18%	27%	15%
Nuneaton & Bedworth	10%	42%	37%	21%
Rugby	13%	33%	38%	23%
Stratford-on-Avon	17%	33%	34%	25%
Warwick	28%	58%	59%	43%
Warwickshire	17%	39%	43%	28%
Coventry-Warwickshire	18%	44%	43%	30%
England	21%	48%	50%	35%

Source: 2011 Census

- 12.56 As noted, this analysis would suggest that most 2-bedroom homes should be built as houses (or bungalows) rather than flats. However, any decisions will still have to take account of site characteristics, which in some cases might point towards flatted development as being most appropriate. The analysis would suggest that the affordable sector might be expected to see a higher proportion of flats than for market housing, although it is still the case that houses are likely to make up the majority of the need in this sector.

Summary

- 12.57 The proportion of households with dependent children is similar to the regional and national average with around 30% of all households containing dependent children in 2011. There is limited variation in the proportion of households with children across areas, although it is notably that the City has a greater proportion of parents.
- 12.58 There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. The analysis linked to demographic change concludes that the following represents an appropriate mix of affordable and market homes for new development, this takes account of both household changes and the ageing of the population – the analysis also models for there to be a modest decrease in levels of under-occupancy (which are particularly high in the market sector).

Table 12.23 Suggested Mix of Housing by Size and Tenure – Coventry-Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	40%	40%	10%
Affordable home ownership	20%	45%	25%	10%
Affordable housing (rented)	35%	35%	20%	10%

Source: Derived from Housing Market Model

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- 12.59 The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households. Also recognised is the limited flexibility which 1-bed properties offer to changing household circumstances, which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing by tenure and also the size requirements shown on the Housing Register.
- 12.60 The mix identified above could inform strategic policies although a flexible approach should be adopted. For example, in some areas Registered Providers find difficulties selling 1-bedroom affordable home ownership homes and therefore the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation. Additionally, in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. The Councils should also monitor the mix of housing delivered.
- 12.61 Analysis also suggests that the majority of units should be houses rather than flats, although consideration will need to be given to site specific circumstances (which may in some cases lend themselves to flatted development). Additionally, the Councils should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.
- 12.62 Based on the evidence, it is expected that the focus of new market housing provision will be on 2- and 3-bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay.

13. SPECIFIC HOUSING MARKET SEGMENTS

Self and Custom-Build Housebuilding

- 13.1 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) (“the 2015 Act”) provides a legal definition of ‘self-build and custom housebuilding’ which is where individuals or associations of individuals (or persons working with or for individuals or associations of individuals) build houses to be occupied as homes for those individuals.
- 13.2 The Government has long had a clear agenda for supporting and promoting the self-build and custom building sector. In *Laying the Foundations: a Housing Strategy for England* (November 2011), the Coalition Government set out plans to enable more people to build or commission their own home.
- 13.3 The Housing and Planning Act 2016 (“the 2016 Act”), which received Royal Assent on 12th May 2016, formally introduced the ‘Right to Build’ at Chapter 2. This 2016 Act required local planning authorities to set up a register of people wanting to undertake a custom or self-build project in their area. Under the ‘duty to grant planning permissions etc.’, the 2016 Act has placed a legal duty on the relevant authority to grant enough planning permissions to meet the demand for self-build housing as identified through its register in each base period. The Self-Build and Custom Housebuilding Regulations 2016 subsequently came into force on 31st October 2016, amending the 2015 Act and implementing Chapter 2 of the 2016 Act.
- 13.4 In the Government’s Housing White Paper²⁸ (paragraph 3.14) in January 2017, the commitment to support the self-build and custom housebuilding sector was reasserted, the Government stating that “*alongside smaller firms, the Government wants to support the growth of custom built homes*” in recognition of the fact that custom build homes are generally built more quickly, built to a higher quality and tend to use more productive and modern methods of construction.
- 13.5 In addition, the Government highlighted that “*fewer homes are custom built in England than many other countries, but there is evidence of more demand for them including from older people*”. According to successive Ipsos MORI polls at the time of the Paper’s publication, more than a million people across the UK expected to buy a building plot, secure planning permission or start/complete construction work on their new home.
- 13.6 On the other side of the argument however, the Government (paragraph 3.15) did acknowledge that there are barriers to self-build and custom housebuilding, including access to finance – as “*mortgages for custom and self-built homes represent a very small proportion of the overall lending*

²⁸ Fixing our Broken Housing Market (DCLG, February 2017)

market"; the planning process and variations to local authority approaches and crucially, land supply and procurement.

- 13.7 The Government has continued to express support for the self-build and custom housebuilding sector through the more recent White Paper: Planning for the Future which was consulted on during August 2020 to October 2020.
- 13.8 On 21st August 2021, an independent review by Richard Bacon MP into scaling up self-build and custom housebuilding was published. The review recognises and champions the benefits of self-build housing including boosting overall housing delivery, increasing choice in the market and delivering homes which are generally high-quality. The report sets out a number of recommendations including raising awareness of the Right to Build, strengthening current legislation and supporting planning reforms to maximise the opportunities for self-build housing.
- 13.9 The Bacon Review and the recommendations set out therein recognise the challenges associated with delivering serviced plots as well as the self and custom build homes on those plots; however, there is also recognition that the UK "lags far behind other developed countries". This includes land assembly and infrastructure (i.e. other countries have a more developed land assembly function); planning (zoned land to build whatever is permitted); SME builders (housing delivered by local builders) and delivery at scale (self and custom build homes delivered on both small and large sites).

Self and Custom Build Registers

- 13.10 As of 1st April 2016, and in line with the 2015 Act and the Right to Build, relevant authorities in England are required to have established and publicised a self-build and custom housebuilding register which records those seeking to acquire serviced plots of land in the authority's area in order to build their own self-build and custom houses.
- 13.11 All of the local authorities in the study area introduced a Self-Build and Custom Housebuilding Register on 1st April 2016 in line with the requirements of legislation. In terms of confirmed monitoring data, there has now been five full base periods up to 30th October 2020.
- 13.12 Across the study area, only Warwick District has introduced a local connections test. They have also implemented a charge for entry onto the register which again is the only local authority in the study area to do so. The impact of which has severely reduced the number of entries onto the register.
- 13.13 Each Council is required to grant sufficient planning permissions to meet the demand identified on the Register as per the 2015 Act (as amended) and must have regard to the entries when carrying out their planning, housing, land disposal and regeneration functions. If assessed over the five base periods, there has been an average of 155 registered expressions of interest in a serviced plot of land and a total of 774 entries.

- 13.14 The Table below provides a base period and local authority breakdown of those individuals who have expressed demand for serviced plots of land in Coventry and Warwickshire. Despite the introduction of a local connection test and fee in Warwick it remains on average the most popular local authority for this type of development although this might not be sustained.

Table 13.1 Serviced Plot Demand by Base Period in Coventry and Warwickshire

Base Period:	1	2	3	4	5	Total	Annual Average
Coventry	0	3	7	2	18	30	6
North Warwickshire	7	4	3	7	4	25	6
Nuneaton & Bedworth	0	4	2	8	3	17	4
Rugby	13	29	29	20	22	113	25
Stratford-on-Avon	39	48	22	44	18	171	38
Warwick	109	110	95	95	9	418	93
Total	168	198	158	176	74	774	155

Source: Right to Build Registers Monitoring. Annual average is over 4.5 yrs

- 13.15 It is worth highlighting that a survey²⁹ undertaken by YouGov on behalf of the National Custom and Self-Build Association (“NaCSBA”) in October 2020 found that awareness of the Right to Build legislation is low with 83% of people unaware that the local authority self-build registers exist. As a result, the number of individuals on a local authority’s self-build register may underestimate demand. On the other hand, it is also noted that individuals can choose to join more than one authority’s register which could result in an element of double counting.

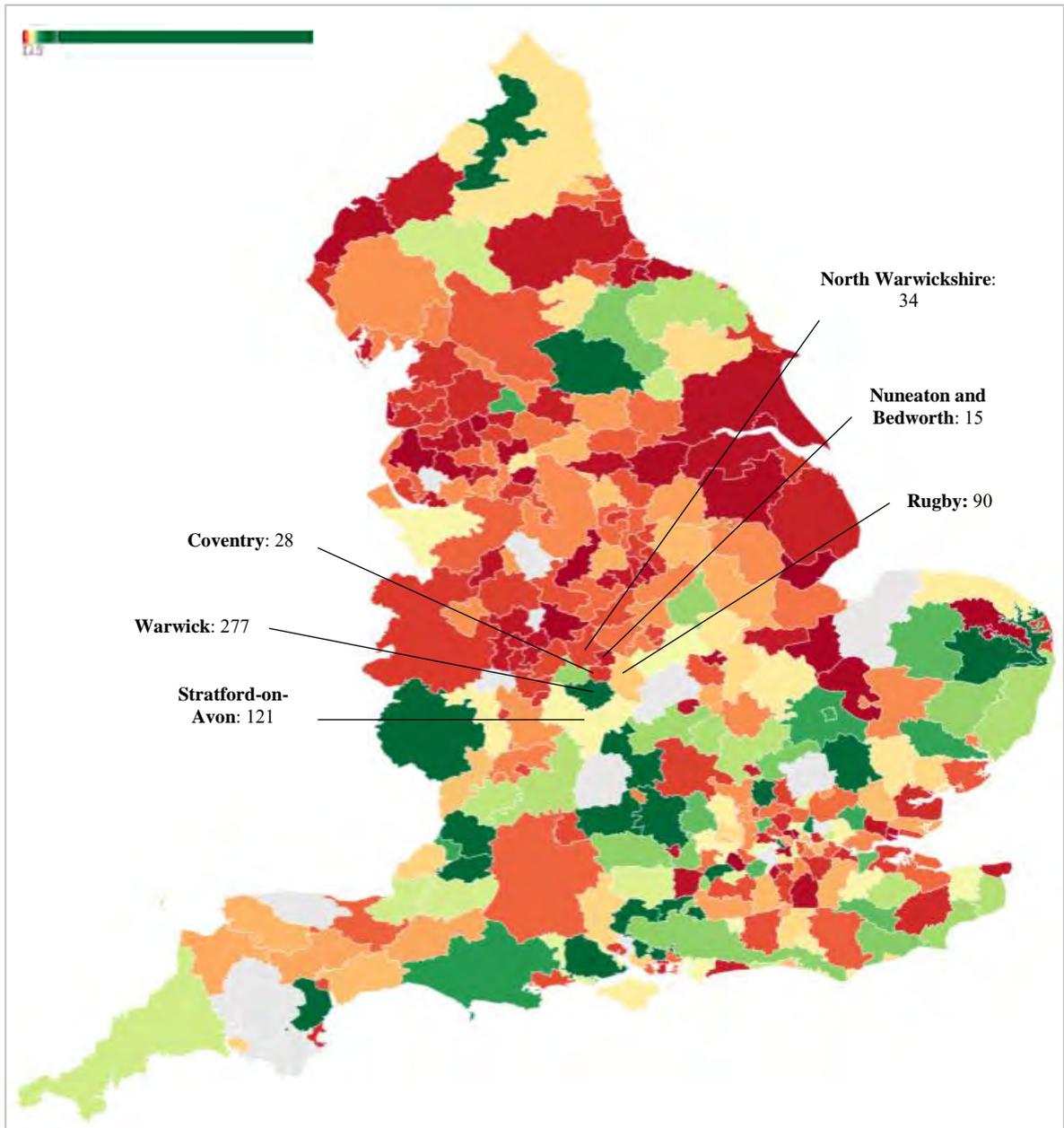
Broader Demand Evidence

- 13.16 In order to supplement the data from the Council’s own register, we have looked to secondary sources as recommended by the PPG, which for this report is data from NaCSBA - the national association for the custom and self-build housing sector.
- 13.17 First, it is worth highlighting that the recent October 2020 survey undertaken by YouGov on behalf of NaCSBA found that 1 in 3 people (32%) are interested in building their own home at some point in the future, including 12% who said they were very interested. Notably, almost half (48%) of those aged between 18 and 24 were interested in building their own home, compared to just 18% of those aged 55 and over. This is notable as, traditionally, self-build has been seen as the reserve of older members of society aged 55 and over, with equity in their property
- 13.18 Second, we can draw on NaCSBA data to better understand the level of demand for serviced plots across Coventry and Warwickshire in relative terms. The association has recently published analysis

²⁹ A survey of 2,017 adults with fieldwork undertaken online between 9th – 11th October 2020. The figures are weighted and are representative of all GB adults aged 18+

with supporting maps and commentary titled “Mapping the Right to Build” in 2019. This includes an output on the demand for serviced plots as a proportion of total population relative to all other local authorities across England. One of the key maps within the report highlights the areas of strongest demand and this is shown in the Figure below.

Figure 13.1: Overall Demand for Self-Build Plots per 100,000 of Population, 2019 Registers³⁰



Source: NaCSBA “Mapping the Right to Build”, 2020.

³⁰ N.B. the data for Coventry does not reflect the revised data set out in Table 2.1 which has been amended to correct previous inaccuracies.

13.19 The map reflects register data from local authorities across the country with Warwick and Stratford showing the greatest demand. The data which sits behind the map states that demand ranges from 277 persons per 100,000 in Warwick and 121 in Stratford-on-Avon to 15 in Nuneaton and Bedworth.

Supporting the Self-Build and Custom Housebuilding

13.20 It is clear that there is demand for self-build and custom housebuilding serviced plots of land across Coventry and Warwickshire – particularly to the south of the study area.

13.21 The Self-Build and Custom Housebuilding PPG sets out how authorities can increase the number of planning permissions which are suitable for self-build and custom housebuilding and support the sector. The PPG³¹ is clear that authorities should consider how local planning policies may address identified requirements for self and custom housebuilding to ensure enough serviced plots with suitable permission come forward and can focus on playing a key role in facilitating relationships to bring land forward.

13.22 There are a number of measures which can be used to do this, including but not limited to:

- supporting Neighbourhood Planning groups where they choose to include self-build and custom build housing policies in their plans. There is already evidence of this in the area (e.g. in the Kenilworth Neighbourhood Plan³²);
- working with Homes England to unlock land and sites in wider public ownership to deliver self-build and custom build housing; and
- when engaging with developers and landowners who own sites that are suitable for housing, encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested;
- working with local partners, such as Housing Associations and third sector groups, to custom build affordable housing for veterans and other groups in acute housing need.

13.23 Icenii would note that an increasing number of local planning authorities have adopted specific self-build and custom housebuilding policies in respective Local Plans to encourage delivery, promote and boost housing supply. There are also a number of appeal decisions in the context of decision-taking which have found that paragraph 11(d) of the Framework is engaged in the absence of specific policy on self-build housing when this is the focus of a planning application.

³¹ Paragraph: 025 Reference ID: 57-025-20210508

³² The Neighbourhood Plan includes a 5% requirement for self-build housing on certain sites

The Policy Response

- 13.24 A specific policy would typically express support for self-build and custom housebuilding. Icenl recognises that all of the local authorities in the study area have such a Local Plan policy (or Draft Local Plan policy in the case of Stratford-on-Avon) supporting Self and Custom Build. In addition to a specific policy, the authorities of Rugby, Stratford-on-Avon and Warwick have also produced an SPG.
- 13.25 Some areas also require that a minimum proportion of plots within development schemes (often over a certain size) are offered to self-builders or as custom-build plots and/or allocation of sites solely for the use. This is often known as the “Teignbridge Rule” after the first District Council to adopt the first self-build policy. In this instance, 5% of all developable housing land is allocated for custom and self-build on larger sites. This policy has a fallback mechanism – if plot(s) have been made available and marketed for at least 12 months and not sold, the plot(s) may either remain on the open market as custom build or be offered to the Council or a Housing Association before being built out by the developer.
- 13.26 An assessment³³ of all Local Plans in England in August 2019 by the Right to Build Taskforce found that 21% of post-legislation Local Plans offered support through a ‘percentage’ policy based on the Teignbridge rule. In addition, around 28% of Local Plans offered support through a mix of policies identifying opportunities; 28% offered support through land allocations and 25% offered support through affordable housing policies.
- 13.27 At present, the local authorities do not have a policy which seeks a percentage of self and custom build housing on larger sites which could enable a greater number of serviced plots to come forward in each area at pace. Stratford-on-Avon has specifically supported delivery of self and custom build within the Gaydon/Lighthorne Heath allocation which serves as a strong example in the study area – the Right to Build Taskforce has labelled this policy as “ambitious” in a positive sense. There are no specific allocations in any of the Local Plans for serviced plots.
- 13.28 Icenl consider that in order to respond to demand in the sector, and in response to the PPG’s requirements, the Councils - particularly those in South Warwickshire where demand is greatest - should continue to express active support self and custom build homes but should also seek a percentage of self and custom build on larger sites with an appropriate fallback mechanism should plots fail to sell; consider opportunities to identify specific sites for serviced plots (i.e. on public sector land, where available) and encourage developers as part of the overall housing mix to incorporate serviced plots where there is evidence of strong demand.

³³ Assessment of all Local Plans in England, Right to Build Task Force, August 2019 [unpublished]

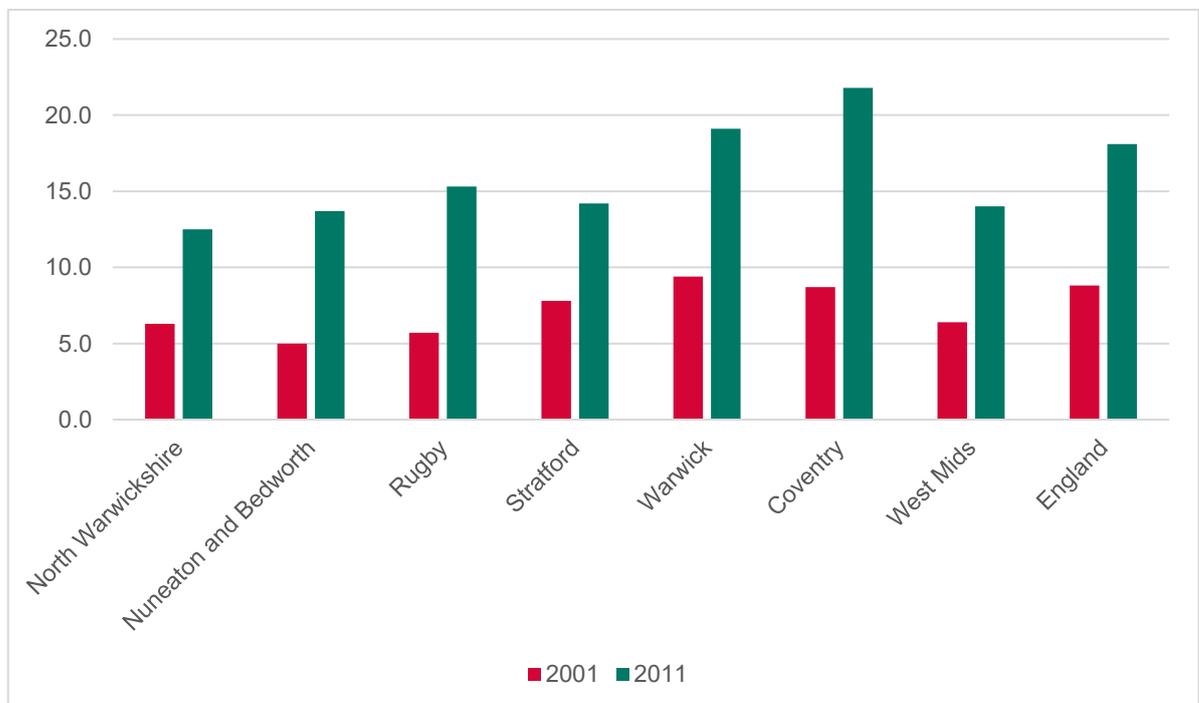
Private Rented Sector

13.29 As a starting point, it is important to consider the profile of renters living in the area, the size of the private rented sector and dynamics associated with values and affordability.

The Size of the Sector

13.30 In Coventry & Warwickshire, the growth in the private rented sector was strong over the last two census points outperforming the national trend between 2001-11. The Figure below shows how the private rented sector changed. The sector is of significant scale and proportion in Warwick District and Coventry District with over a fifth of households (22%) living in the PRS in Coventry; which partly reflects its City status. Over 10,500 households lived in the sector in Warwick in 2011 with over 26,500 households living in the sector in Coventry.

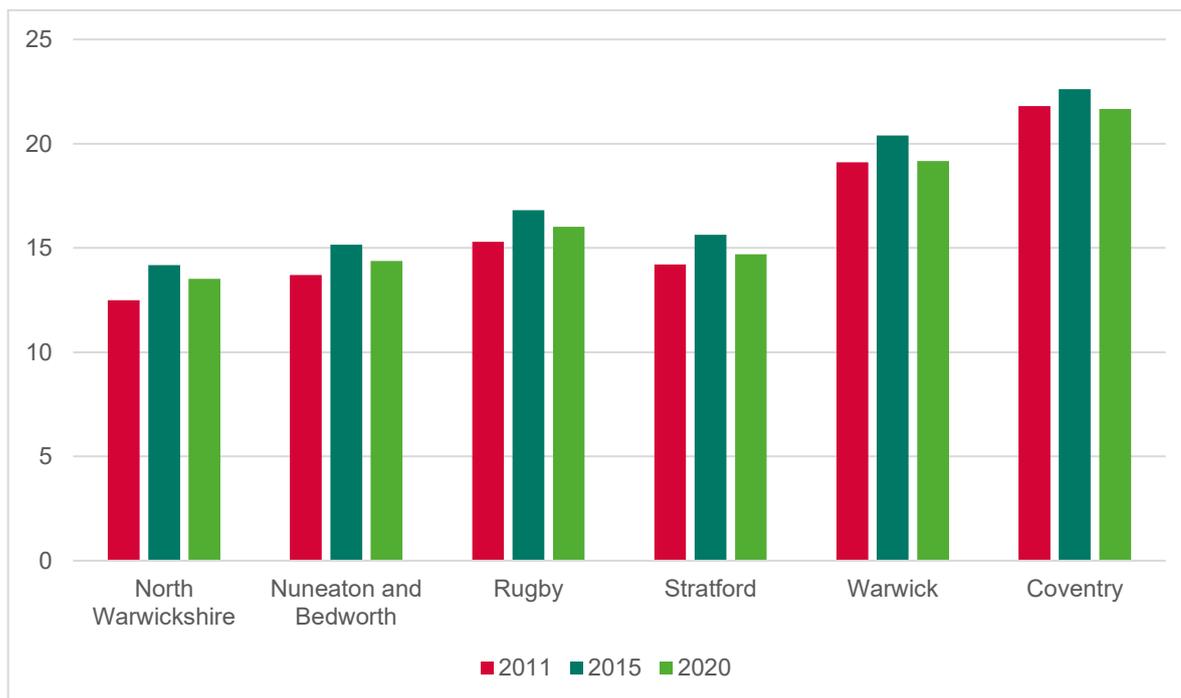
Figure 13.2: Growth in the Private Rented Sector, 2001-2011 (% Proportion)



13.31 In order to bring this up to date, IcenI has drawn on data published by ONS which provides a view on how the tenure profile may have evolved since the 2011 Census. It should be caveated that the confidence value varies greatly by authority and the data is therefore only intended to provide a broad view on the potential tenure profile. Clearly as the Census 2021 data begins to emerge, we will have a clearer understanding of the true picture.

13.32 Bearing this in mind, the Figure below shows how the tenure profile could have changed across the study area over the period from 2011 to 2015 to 2020. As is clear, the proportion of households living in the private rented sector increased notably in 2015 in all authority areas, but the proportion has decreased over the period to 2020.

Figure 13.3: Potential Change in Tenure Profile, PRS, 2011-2020



13.33 This aligns with the national picture with the latest English Housing Survey³⁴ stating that the proportion of households in the private rented sector decreased over the period 2015/16 to 2020/21. In England in 2020/21, the private rented sector accounted for 19% of all households down from 20% in 2015/16 with private renting more prevalent in London (27% of all households) compared to the rest of England (17%).

13.34 Regardless, it is clear that overall, the sector has grown substantially over the last two decades and continues to play a key role in the market, particularly in Coventry City and Warwick District where the size of the sector is notably above the national average outside of London.

The Profile of Renters

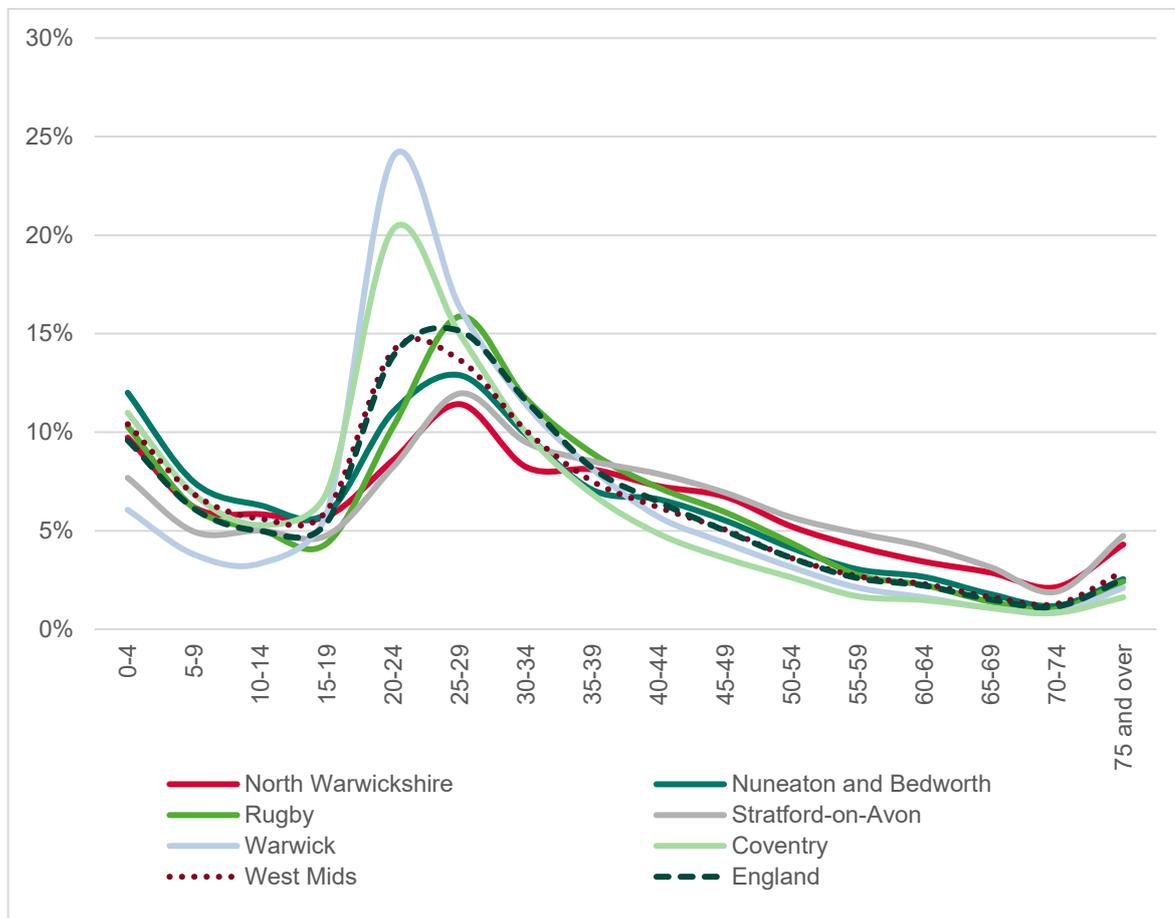
13.35 As is shown in the Figure below, the age of those renting at the point of the 2011 Census across the study area was skewed towards those aged 20 to 39 in line with the regional and national average. In North Warwickshire and Stratford-on-Avon, there was a higher proportion of those aged 40 and over whereas in Warwick and Coventry, the proportion of households in their 20s was significantly higher – reflecting the large student population in both areas.

13.36 In Warwick District and Coventry City, 40% and 35% of private renters were aged in their 20s respectively - significantly higher than the national average of 29% and all other Districts. The main

³⁴ English Housing Survey 2020/21

difference between Coventry and Warwick was the notable proportion of younger children aged 14 and under in the former (23% of households) compared with the latter (13% of households).

Figure 13.4: Age Profile of Private Rented Sector Tenants, Coventry & Warwickshire



Source: 2011 Census

- 13.37 Turning to household composition, the Table below identifies the profile of each household living in the private rented sector and how this varies across the study area. Across the board, the analysis shows that the largest household group was single person households aged under 65 accounting for over a quarter (28%) of all households on average which is typical of the private rented sector profile.
- 13.38 There are however clear variances between each authority area. In Warwick District, over a third (34%) of private renters were singles aged under 65 with Coventry City having the lowest proportion; although, it should be noted that Coventry had the highest number of younger single households in absolute terms. In both areas, full-time students account for around a tenth of private renting households with a high proportion of lone parents with children also living in the sector in Coventry.

Table 13.2 Household Composition of Private Renters (%)

	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry
One Person Aged 65+	6%	4%	3%	7%	3%	3%
One Person Aged <65	27%	29%	29%	27%	34%	26%
Couple Aged 65+	3%	1%	1%	3%	1%	1%
Couple No Children	18%	15%	20%	21%	20%	11%
Couple Dep. Children	19%	20%	19%	18%	11%	16%
Couple Non-Dep.	3%	2%	2%	3%	1%	1%
Lone Parent Dep.	12%	18%	11%	9%	8%	17%
Lone Parent Non-Dep.	3%	2%	2%	2%	1%	2%
Full-Time Students	0%	0%	0%	0%	9%	10%
Other Households	8%	9%	13%	10%	12%	13%
All Households (No.)	2,913	6,683	5,903	6,596	10,513	26,503

Source: Census 2011

- 13.39 In the Districts outside of Coventry and Warwick, the profile of households in the sector is more focussed towards couples with and without children accounting for between 35% of all households in Nuneaton and Bedworth to 40% in Rugby. In Rugby, in line with Warwick and Coventry, there is also a high proportion of “other households” (including unrelated adults sharing).
- 13.40 In respect of where residents (household reference persons or “HRP”) living in the private rented sector work, the Table below sets out the industries of employment of HRPs in the PRS. This shows that the two main industries of those living in the sector are (1) public administration, education and health as well as (2) distribution and hospitality. In Warwick and Stratford-on-Avon, there is also a strong representation of those working in financial and professional industries. This is also true for Coventry when focussing solely on the significant number of those HRPs working in the industry.

Table 13.3 Industry of Employment of Private Renters

	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry
Agriculture, energy and water	5%	3%	2%	5%	3%	2%
Manufacturing	12%	12%	11%	9%	10%	10%
Construction	9%	7%	6%	8%	5%	5%
Distribution and Hospitality	25%	27%	24%	24%	21%	26%
Transport and communication	14%	13%	19%	9%	12%	12%
Financial, Prof and Admin	13%	11%	12%	19%	18%	14%
Admin, education & health	18%	22%	21%	17%	24%	25%
Other	4%	6%	4%	8%	6%	5%

Source: Census 2011

- 13.41 Turning to the occupation of all HRPs living in the PRS, the Table below is clear in showing that there is a high proportion of high skilled, professional households in the sector in Warwick District and Stratford-on-Avon with 57% and 46% of HRPs working in the top three major occupation groups respectively. This compares with only 32% in Coventry City with the area having a much higher proportion of HRPs in low skilled roles in (40% of all households) which is also the case in North Warwickshire, Nuneaton and Bedworth and Rugby.

Table 13.4 Occupation of Private Renters

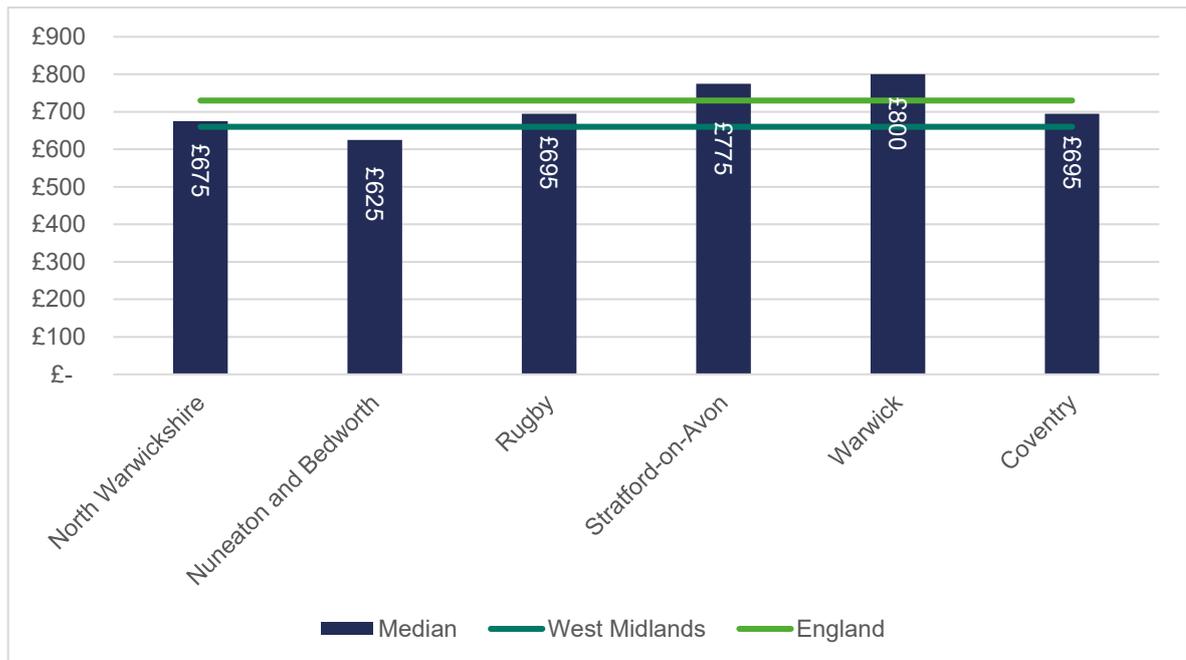
	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry
Managers and Directors	11%	9%	10%	16%	12%	6%
Professional	12%	10%	14%	15%	29%	16%
Associate Professional	10%	9%	11%	14%	17%	9%
Admin and Secretarial	8%	9%	9%	8%	8%	9%
Skilled Trades	15%	13%	11%	17%	9%	9%
Caring and Leisure	8%	11%	7%	7%	6%	10%
Sales and Custom Service	6%	8%	5%	5%	6%	10%
Process and Machine	13%	13%	12%	6%	4%	9%
Elementary	16%	19%	22%	10%	9%	20%

Source: Census 2011

Rental Market Statistics

13.42 Across the study area outside of Nuneaton and Bedworth, median rents are higher than the regional average of £660 PCM. The median rent ranges from a low of £625 PCM in Nuneaton and Bedworth District to highs of £775 PCM in Stratford-on-Avon District and £800 PCM in Warwick District – both of which have median rental values above the national average.

Figure 13.5: Median Rents by Authority, 2021



13.43 If we drill into median rents by property size, the Figure and Table below shows that the private rents in Warwick and Stratford-on-Avon for all property sizes except for studios are above the regional and national median. The median rents for 1 bedroom properties in Warwick are around £695 PCM with median rents for 2 bedroom properties at £825 PCM – significantly higher than the national equivalent of £700 PCM.

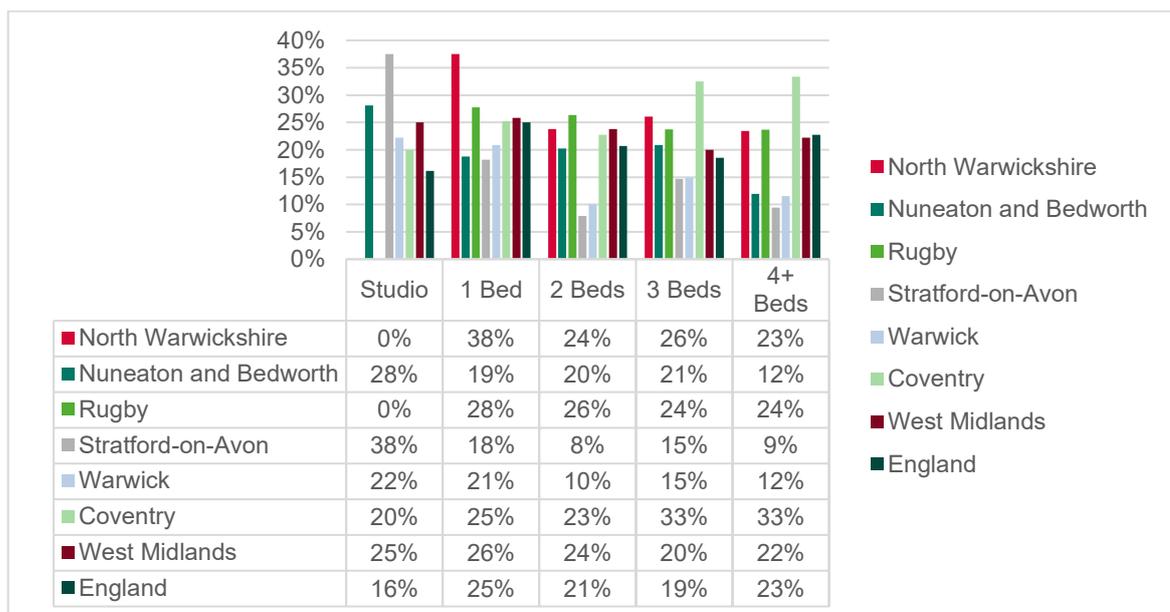
13.44 There are also strong rents in relative terms for family sized housing of 3 bedrooms in Warwick District at £1,000 PCM and in Rugby District at £975 PCM. In Coventry City, which has the largest private rented sector, median rents sit marginally above the regional median for all sizes but below the national median. In the context of a Build to Rent or co-living product, the rental values in Warwick and Stratford-on-Avon are more likely to attract an institutional investor; however, clearly the size of the market in Coventry City provides the critical mass necessary to make such a product work.

Figure 13.6: Monthly Median Rents by Size, Year to March 2021



13.45 Turning to rental trends, the evidence indicates that median rents have increased over the last seven years across the board but to the greatest extent in Coventry City at 33% when lettings are taken as a whole. This is followed by Nuneaton and Bedworth (25%) and North Warwickshire (23%). In comparison, growth in Warwick and Stratford-on-Avon has been notably weak.

Figure 13.7: Rental Growth in Coventry & Warwickshire, 2014 – 2021 (%)



Source: Icen analysis of ONS Private Rental Market Statistics. Note no data provided for rooms.

13.46 In the context of a Build to Rent or co-living product where properties tend to be developed with 1 and 2 bedrooms and to some extent 3 bedrooms, rental growth has been relatively strong in Coventry, Rugby and North Warwickshire; however, it is recognised that the latter has a small private rental market.

Affordability of the PRS and Local Housing Allowance

13.47 Affordable rents as well as securing the initial rental deposit constitute a key barrier to accessing housing for some households, particularly as private rents have grown faster than household incomes and above housing benefit allowances. The relative unaffordability of larger, family sized, homes for rent can often result in distortions and inefficiency in the market limiting the development of larger properties despite evident local needs.

13.48 The Local Housing Allowance (“LHA”) sets the amount of housing benefit or Universal Credit housing element that households in the private rented sector can claim. It is intended to reflect the lowest 30th percentile of local private rents to allow welfare claimants access to the market. On 1st April 2020, LHA rates were increased – following a five year freeze – to ensure that the rates covered the 30th percent of market rents in each area.

13.49 The latest allowances by bedroom size are set out in the Table below for the various BRMAs which cover the six authorities in the study area. The rates for 1 bedroom properties up to 4 bedroom properties are shown.

Table 13.5 Monthly LHA Rate³⁵ by Broad Rental Market Area by Size

BRMA	Authorities Covered	1 Bed	2 Beds	3 Beds	4 Beds
Birmingham	North Warwickshire	£525	£625	£675	£850
Coventry	North Warwickshire, Coventry, Nuneaton & Bedworth, Rugby and Warwick	£490	£575	£675	£875
Mid Staffs	North Warwickshire	£425	£550	£650	£850
Solihull	North Warwickshire, Stratford-on-Avon and Warwick	£575	£725	£875	£1,200
Rugby & East	Rugby and Stratford-on-Avon	£525	£640	£750	£995
Cheltenham	Stratford-on-Avon	£550	£695	£850	£1,195
Cherwell Valley	Stratford-on-Avon	£650	£775	£900	£1,297
Warwickshire South	Stratford-on-Avon and Warwick	£625	£750	£900	£1,200

Source: VOA, 2022

13.50 If we then set these LHA rates against private rental values and focus on the lower quartile rents (i.e. the lowest 25% or “entry-level rents”) for the study area authorities, it is clear that LHA has fallen below market rents for certain property sizes in a number of areas despite the LHA rate being increased on 1st April 2020. The Table below shows the difference between the LHA cap and entry-level rents.

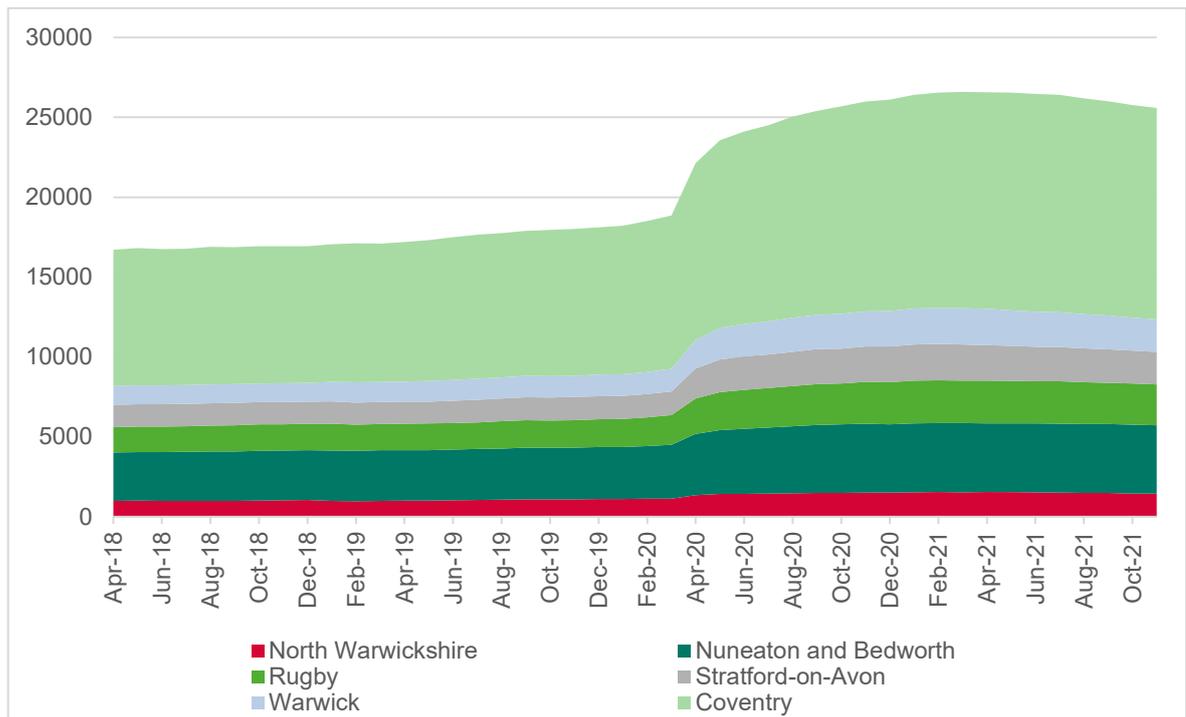
³⁵ LHA Rate correct in February 2022

Table 13.6 LQ Rents set against LHA Rates by Authority Area

		1 Bed	2 Beds	3 Beds	4 Beds
North Warks	LQ Rent	£485	£580	£650	£950
	Birmingham BRMA	£525	£625	£675	£850
	Difference	£40	£45	£25	-£100
	Coventry BRMA	£490	£575	£675	£875
	Difference	£5	-£5	£25	-£75
	Mid Staffs BRMA	£425	£550	£650	£850
	Difference	-£60	-£30	£0	-£100
	Solihull BRMA	£575	£725	£875	£1,200
Difference	£90	£145	£225	£250	
Nuneaton and Bedworth	LQ Rent	£425	£550	£625	£863
	Coventry BRMA	£490	£575	£675	£875
	Difference	£65	£25	£50	£12
Rugby	LQ Rent	£525	£650	£750	£1,000
	Coventry BRMA	£490	£575	£675	£875
	Difference	-£35	-£75	-£75	-£125
	Rugby & East BRMA	£525	£640	£750	£995
	Difference	£0	-£10	£0	-£5
Stratford-on-Avon	LQ Rent	£600	£700	£875	£1,200
	Cheltenham BRMA	£550	£695	£850	£1,195
	Difference	-£50	-£5	-£25	-£5
	Cherwell Valley BRMA	£650	£775	£900	£1,297
	Difference	£50	£75	£25	£97
	Rugby & East BRMA	£525	£640	£750	£995
	Difference	-£75	-£60	-£125	-£205
	Solihull BRMA	£575	£725	£875	£1,200
	Difference	-£25	£25	£0	£0
	Warwickshire South BRMA	£500	£625	£750	£950
Difference	-£100	-£75	-£125	-£250	
Warwick	LQ Rent	£650	£770	£900	£1,238
	Coventry BRMA	£490	£575	£675	£875
	Difference	-£160	-£195	-£225	-£363
	Solihull BRMA	£575	£725	£875	£1,200
	Difference	-£75	-£45	-£25	-£38
	Warwickshire South BRMA	£500	£625	£750	£950
	Difference	-£150	-£145	-£150	-£288
Coventry	LQ Rent	£525	£625	£725	£950
	Coventry BRMA	£490	£575	£675	£875
	Difference	-£35	-£50	-£50	-£75

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- 13.51 As the analysis shows, there are differences between LHA rates in certain authority areas when set against entry-level rents - which points to particular challenges for both single households and family households who are trying to access the sector on lower incomes in these areas. It is particularly challenging for households in areas including Warwick and Coventry where LHA rates are below LQ rents for all sizes.
- 13.52 The changing nature of welfare benefits payments, particularly housing benefits and the introduction and shift to Universal Credit have direct implications for lower earning and economically inactive households.
- 13.53 The operation of the welfare benefit cap has been in place now for a number of years, restricting the total amount of benefit - including housing benefits - which in turn serves to restrict housing choice and opportunity for those family households affected as is evident from our analysis. The maximum amount of welfare and housing benefit is capped currently at £384.62 per week or £1,666.67 per month outside of London for families with children and couples.
- 13.54 It is possible to drill into the number of private rented sector households supported by Housing Benefit or Universal Credit. In November 2021, a total of 69,950 residents in the study area claimed housing benefit or Universal Credit with a housing element. Out of these claimants, around 25,590 lived in private rented accommodation (equal to 37% of all claimants) with Coventry City having the highest proportion of claimants living in private rented housing at 41% of all claimants and Warwick District having the lowest at 25%.
- 13.55 The Figure below shows how the number of claimants living in private rented accommodation has changed over time. Combined, the total number of claimants in the PRS increased from 16,710 in April 2018 to 25,590 in August 21 which is equal to an increase of 28%. As is clear, there was a notable increase following the introduction of lockdown measures in March 2020 in relation to the Covid-19 pandemic – with a significant increase seen in Coventry City.

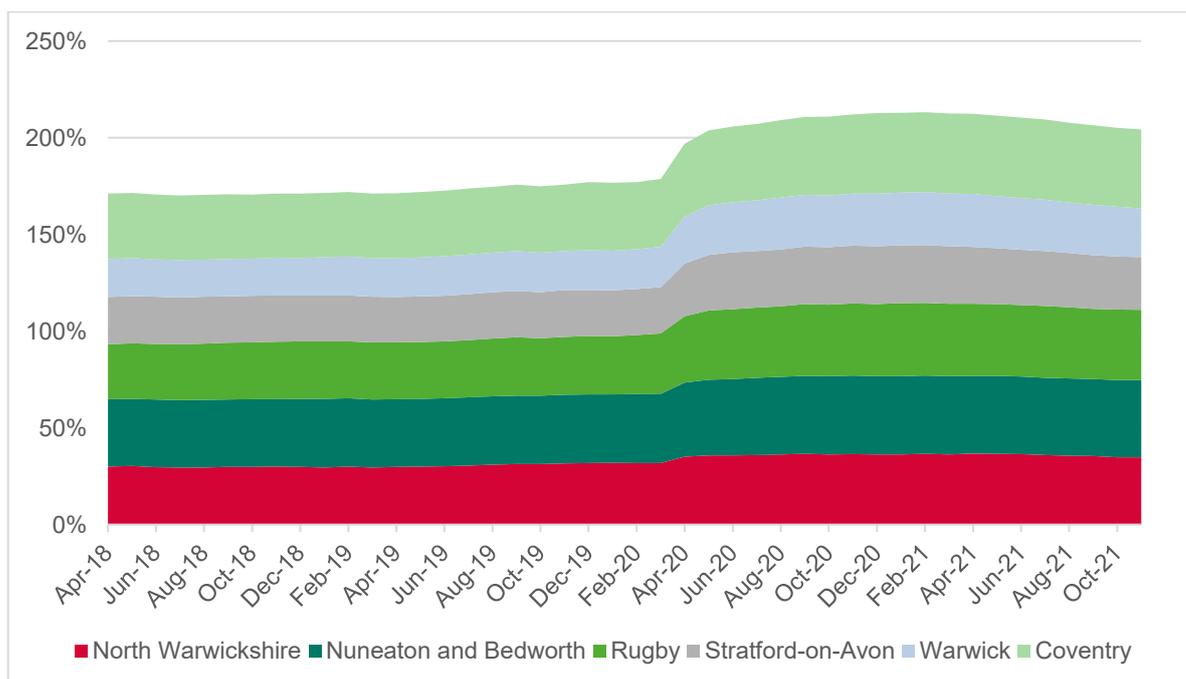
Figure 13.8: Households in Private Rented Sector Supported by Housing Benefits or UC



Source: DWP

13.56 Over the same period, the proportion of claimants living in the private rented sector increased from 31% to 37%. As is shown in the Figure below, at a local authority level, Coventry City and Rugby experienced the largest increases of claimants in the PRS. The sector has played a key role in supporting households claiming Universal Credit.

Figure 13.9: Proportion of Households Claiming Housing Benefit in PRS



Source: DWP

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- 13.57 It is the case that for many living in the PRS, barriers to households becoming homeowners are less likely to relate to income and/or the cost of housing and more about other factors such as saving for a deposit or difficulties obtaining a mortgage. However, it should also be noted that some households will choose to rent privately as this can be a more flexible option – particularly in Coventry City where entry-level rental values are notably lower than adjoining Warwick District.

Build to Rent Development

- 13.58 In the context of the private rented sector's growth over the last 20 years and a national housing shortage, successive Governments have looked to the private rented sector to play a greater role in providing more new build housing and have sought to encourage "Build to Rent" development.

The Policy Context

- 13.59 In respect of Build to Rent, the Housing White Paper (February 2017) was clear in 2017 that the Government wanted to build on earlier initiatives to attract new investment into large-scale scale housing which is purpose-built for market rent (i.e., Build to Rent).
- 13.60 At that time, the Government set out that this would drive up overall housing supply, increase choice and standards for people living in privately rented homes and provide more stable rented accommodation for families – particularly as access to ownership has become more challenging.
- 13.61 This was realised through the publication of the revised Framework (February 2019) which recognises the emergence of the strength of the private rented sector. The Framework (paragraph 61) says the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including those people who rent their homes (as separate from those in affordable housing need). The Framework's glossary also introduces a definition for Build to Rent development, thus recognising it as a sector:

"Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development".

- 13.62 It represents development which is constructed with the intention that it will be let rather than sold. The benefits of Build to Rent are strong and are best summarised in the Government's A Build to Rent Guide for Local Authorities which was published in March 2015. The Guide notes the benefits are which ranging but can include:

- Helping local authorities to meet demand for private rented housing whilst increasing tenants' choice "as generally speaking tenants only have the option to rent from a small-scale landlord".

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- Retaining tenants for longer and maximising occupancy levels as Build to Rent investment is an income focused business model;
 - Helping to increase housing supply, particularly on large, multiple phased sites as it can be built alongside build for sale and affordable housing; and
 - Utilising good design and high-quality construction methods which are often key components of the Build to Rent model.

13.63 This Build to Rent Guide provides a helpful overview of the role that Build to Rent is intended to play in the housing market, offering opportunities for those who wish to rent privately (i.e. young professionals) and for those on lower incomes who are unable to afford their own home.

13.64 Over recent years there has been a rapid growth in the Build to Rent sector backed by domestic and overseas institutional investment. Turning to the present and the latest market insight on Build to Rent as it begins to mature and strengthen as a development sector, the Savills UK Build to Rent Market Update³⁶ for Q3 2021 states that the market now had 50,800 completed units, 37,700 under construction and 84,000 in the development pipeline, a total of 172,500 units.

13.65 The report notes that around 88% of the operational stock was located in City Centre flats but there had been a slight shift towards “housing led, family targeted” Build to Rent schemes in suburban locations. This was on the belief that there is a wider PRS market for houses (63%) than for flats.

13.66 The Savills work also noted that the sector had bounced back from a Pandemic related slowdown. They also noted new entrants into the sector seeking longer term investment.

The Profile of Tenants

13.67 The British Property Federation (“BPF”), London First and UK Apartment Association (“UKAA”) recently published (February 2021) a report³⁷ profiling those who live in Build to Rent accommodation in London - which makes up the bulk of the market. The proportion of Build to Rent in London accounts for 47% of current provision falling to 44% once the pipeline supply is included. This demonstrates a slight movement out of London which goes against the historic trend. There is now more Build to Rent activity outside of London than in the Capital.

³⁶ https://www.savills.co.uk/research_articles/229130/306754-0

³⁷ https://buildtorent.files.wordpress.com/2021/01/who-lives-in-build-to-rent-1.pdf?mc_cid=624df5d223&mc_eid=e05cc2220b

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- 13.68 Around 62% of residents were aged between 25 and 34 compared with 47% in the wider private rented sector market. The remaining residents included 17% aged between 16 and 24 and 13% aged 35-44 both of which were below the corresponding values for the wider private rented sector market.
- 13.69 The survey based data identified that incomes are similar to those in private rented sector accommodation with 43% earning less than £32,000 and 29% earning between £32,000 and £47,000. Typically, Build to Rent residents spend between 29% and 35% of their income on accommodation. This compares to 29% to 32% in the wider private rented sector demonstrating a willingness to pay slightly more. The lower value would put this group in the lowest 40% of earners in London.
- 13.70 The report noted that Build to Rent has comparable levels of affordability but is notably more affordable for couples and sharers. This is perhaps reflected in the higher incidence of these household types within the Build to Rent sector.
- 13.71 The report also identified a broadly similar balance of people working in the public and private sectors with 90.5% of residents employed in the private sector living in Build to Rent accommodation compared with 80% in the private rented sector. The most common industries included Finance and Insurance (25%), Other Services (20%) and IT and Communications (including marketing) (15%); however, it should be highlighted that this was London focussed as the key area for the product.

The Existing Build to Rent Provision

- 13.72 The authority areas in the study area currently have no planning policy in place to deal with planning applications which are submitted for Build to Rent development; although this in part reflects the recent emergence of the sector and changes to national planning policies concerning the status and importance of Build to Rent as part of the private rental market.
- 13.73 However, in some areas, this has not hindered Build to Rent coming forward. As is clear from the Table below, there have already been a handful of schemes which have come through the planning system. A total of 531 Build to Rent units are either coming forward and are under construction or have already been delivered in Rugby, Coventry and Stratford-on-Avon. To date, there has been no activity in Warwick District.

Table 13.7 Build to Rent Provision, 2022

	Consented	UC	Completed	Total
North Warwickshire	0	0	0	0
Nuneaton & Bedworth	0	0	0	0
Rugby	0	360	0	360
Stratford-on-Avon	0	0	82	82
Warwick	0	0	0	0
Coventry	0	0	89	89
Total	0	360	171	531

Source: LPA Monitoring

- 13.74 In Rugby District, 360 Build to Rent units are coming forward as part of the regeneration of the town's Market Quarter. The scheme is being delivered across four separate blocks providing for 1 and 2 bedroom apartments. At this stage, no other schemes for Build to Rent have reached pre-application stage.
- 13.75 In Coventry City, 49 Build to Rent units have been constructed as part of the Spirits Quarter regeneration development with a mix of 2, 3 and 4 bedroom homes coming forward as part of Phase 1 of the wider development site. A separate scheme at Herbert House located in Tile Hill has also delivered 40 units – providing a mix of 1 and 2 bedroom apartments. A 1 bedroom apartment is currently on the market for £625 PCM, and a 2 bedroom apartment is currently on the market for £730 PCM. These rents are notably above median rents in the City for the respective sizes.
- 13.76 In Stratford-on-Avon, 82 Build to Rent units have been delivered at Fordham House in Stratford-upon-Avon providing for a mix of 1 and 2 bedroom apartments. At the time of writing, the development is fully let. A 1 bedroom apartment was let at £750 PCM in June 2021 which is £100 PCM more than the median rent for this size; however, this fee includes extras such as wi-fi.

The Recommended Policy Response

- 13.77 It is evident that the private rented sector is growing and there is a particular age profile and household group that it caters for which are factors all in line with the target tenant of the Build to Rent product. The PPG on Build to Rent recognises that where a need is identified that local planning authorities should include a specific plan policy relating to the promotion and accommodation of Build to Rent.
- 13.78 Icenl consider there will be an ongoing need and a role for Build to Rent provision to continue to support these particular household groups for years to come moving forward. Having looked in detail at the sector across the study area, there is evidence of the necessary characteristics of target tenants as well as the overall market in Warwick, Coventry and Rugby. As a result, it is recommended that a specific policy is developed by these three authorities. As the market for suburban build-to-

rent development matures, there is potential for a greater role for the sector in these and other locations.

- 13.79 A Local Plan policy would effectively set out parameters regarding how schemes would be considered, and how affordable housing policies would be applied. In considering the dwelling mix proposed in relation to a Build-to-Rent scheme; we would expect the focus to be on 1, 2 and some 3-bed properties given the occupancy profile associated with Build to Rent accommodation. However, given that this is still a relatively embryonic sector, the Councils need not be overly prescriptive.
- 13.80 The Framework's definition of Build-to-Rent development sets out that schemes will usually offer tenancy agreements of three or more years and will typically be professionally managed stock in single ownership and management control. It would be appropriate for the Council to adopt a consistent definition.
- 13.81 The Councils will need to consider affordable housing policies specifically for the Build-to-Rent sector. The viability of Build to Rent development will however differ from that of a typical mixed tenure development: returns from the Build to Rent development are phased over time whereas for a typical mixed tenure scheme, capital receipts are generated as the units are completed.
- 13.82 In general terms, it is expected that a proportion of Build to Rent units will be delivered as 'Affordable Private Rent' housing. The PPG³⁸ states that:

"The National Planning Policy Framework states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord.

20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion, they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan. Similarly, the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark.

National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a

³⁸ ID: 60-002-20180913

discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development”

- 13.83 The Councils should have regard to the PPG on Build-to-Rent development with the starting point for affordable housing therefore being that 20% of units would be Affordable Private Rented units at a discount of 20% to local market rents.

Co-Living

- 13.84 The concept of co-living in its modern form of housing is relatively new, and whilst it is not specifically defined in the Framework, it is often used as part of a wider definition relating to a type of intentional community where residents share living space and a set of interests, values and/or intentions.
- 13.85 Traditionally co-living has ranged from the coming together of space, time and resources for activities - for example, meals and discussion in the common living areas - through to shared workspace and collective endeavours such as living more sustainably.
- 13.86 Over recent years, media interest in co-living has in part been driven by the pressures faced by the millennial generation and the potential to provide communal living driven by affordability and a transient, social oriented young professional resident in high cost locations. Traditionally the idea of co-living through sharing of rented housing is not a new idea and has long operated across the country. In this context, co-living can encompass many structural forms.
- 13.87 In its current form, modern co-living in the UK tends to be urban focused and integrated into a single building, house, or apartment, a sharing of amenities, and a demographic trend towards 20 to 30 something professionals. As a market segment, this is most well developed currently in London where companies such as The Collective, Roam, Fizzy Living and Lyvly are actively adopting a 'WeWork' style model to housing based on a new renting approach for the Capital that offers private bedrooms, shared common spaces and community events, and an all-inclusive rent.
- 13.88 The focus of existing co-living examples tend to be large city schemes with studies indicating that whilst the sharing of space is deemed more acceptable - especially by city dwellers - the model of co-living needs to carefully consider the scale of provision balanced alongside personal space needs and privacy.

13.89 There are a number of benefits of Co-Living with the main benefit being that it is a safe and reliable form of housing in a time of huge housing shortage. More widely, Cleaver and Frearson³⁹ have recently highlighted six specific categories of the advantages of Co-Living as follows:

1. Affordability;
2. Health and happiness;
3. Choice and flexibility;
4. Safety and security;
5. Diversity; and
6. Sustainability

13.90 In terms of affordability, the provision of shared space offers cost savings. This is mirrored by research conducted by CBRE⁴⁰ which found that “co-living is a cost-effective city centre housing solution, that achieves impressive densities”.

13.91 As previously mentioned, one of the demand drivers of an increase in co-living is due to the affordability, because of the decline in affordability of homeownership, this has shifted demand for private rental housing. Co-living also provides more choice and flexibility as well as shared live/workspace which in turn creates diversity.

13.92 With the pandemic-driven shift towards professionals working from home, the availability of dedicated space to work is an important attractor. However it has been reported⁴¹ that some operators have felt the impact on their business model as “Government restrictions have forced operators to suspend some perks, limit mixing and stop all but essential travel” and in some cases outside visitors where banned during lockdowns. As a result the demand for such homes has slowed.

Cost of Co-living

13.93 Due to the limited number of enquiries around co-living development in the study area, it is difficult to grasp the potential cost of this accommodation. It also needs to be considered that the cost of co-living is not directly comparable to rental accommodation as it includes the cost of utilises as well as access to shared facilities (e.g. gyms, cinema rooms etc.) the extent and quality of which will differ from development to development. Some developers even reduce costs for those that sign up to longer tenancies.

³⁹ All Together Now: The Co-living and Co-working Revolution (Cleaver, Naomi and Frearson, Amy), 2021

⁴⁰ <https://www.cbre.co.uk/services/business-lines/valuation-and-advisory/valued-insights/articles/introduction-to-Co-Living>

⁴¹ <https://www.bloomberg.com/news/articles/2021-06-16/the-collective-said-to-explore-sale-as-pandemic-curbs-co-living>

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- 13.94 Where there is an established co-living market in the UK (i.e. London and Manchester), we have looked to draw out comparables. In London, co-living studio flats can range from £1,050 per month in Hounslow to two-bedrooms at £1,650 per month in Camden⁴².
- 13.95 In Manchester, some co-living studio apartments are being marketed⁴³ from £215 per week which equates to £930 per month. However, this particular example includes access to co-working space as well as co-living as part of the overall rental cost.
- 13.96 These costs compare to the equivalent median rent e in the wider private rented market in Hounslow of £800 for a studio and £1,950 per month for a two bedroom home in Camden. In Manchester, the average Studio flat is £575 per month. Once bills are added to rental costs it reasonable to say that cost of co-living is comparable to renting although less so in Manchester and most likely in the study area. This would make broad sense as a burgeoning sector would struggle to get a foothold in the market if it was considerably more expensive than traditional stock.
- 13.97 It is also the case that as more of the space the developer/owners are able to make more money per square foot than they do from traditional rental accommodation as each tenant is charged for it. The developer can also benefit from added sales in the facilities they provide (e.g. if they have a coffee shop).

The Typical Profile of Tenants

- 13.98 The growth in the market for co-living developments is linked to the wider growth in the private rented sector as considered upfront in this section - and the rise of house sharing within this - and has seen particular interest from the younger population. One key macroeconomic factor is due to the affordability constraints of home ownership, which has resulted in a growing number of people renting homes and for a longer level of time (e.g. whilst households save for a deposit).
- 13.99 Co-living has evolved because of the way of people live. There's a change in "patterns of work, rising loneliness, ageing...making us think differently about the sorts of homes we want, and co-living is one potential solution", according to CBRE⁴⁴. It is the case that young professionals in particular are being pushed towards private rented accommodation due to rising house prices and newer generations prefer a more flexible approach to living⁴⁵. For this group, the offer of a flexible, short-

⁴² <https://www.gravitycoliving.com/blog/cost-living-london/>

⁴³ <https://www.oppidan-life.com/location>

⁴⁴ <https://www.cbre.co.uk/services/business-lines/valuation-and-advisory/valued-insights/articles/introduction-to-Co-Living>

⁴⁵ <https://www.fmindustry.com/en/2019/perspectives/47798/Why-Co-Living-is-Driving-the-UK%27s-Private-Rental-Sector-private-rental-homes-UK-Co-Living-Millennials-property-asset-classes-Residential-Property-United-Kingdom.htm>

term leases and an opportunity to live in a part of community (with all bills covered), is particularly appealing.

13.100 Overall, therefore, the current co-living business model and characteristics principally draw on a large base of transient younger, high skilled professional households and individuals - particularly those without dependents. If we consider the profile of private renters across the study area, as set out upfront in this section, these are characteristics which are akin to Warwick District and Rugby District. Owing to the size of the market and potential in Coventry City, this must also be an area to test.

13.101 There is a high proportion of single individuals aged between 20-39 in these areas with a relatively high proportion in higher skilled roles living in the sector in Rugby and Warwick. There is also a high proportion of 'other' households in the sector – particularly in Coventry City - which includes unrelated adults sharing which all points towards an underlying market for a co-living product. Clearly, not all individuals which have these characteristics will choose a co-living product; however, there is unarguably a large base relative to the target demographic.

The Current Co-Living Position in Coventry and Warwickshire

13.102 The Councils have no specific policy on co-living development owing to the fact that co-living is a relatively new housing model with few schemes outside of London. It is also the case that none of the authority areas have any pipeline supply for such housing developments. However, the product is embryonic, and we would expect a number of schemes to come forward via pre-application discussions in the coming months.

The Policy Response

13.103 On the same basis that there is a strong foundation to develop policy around Build to Rent, it is considered that a specific policy should be developed for co-living housing in Coventry City, Warwick District and Rugby District in the main urban areas. The nature of the market in these areas demonstrates that there is potential for a market to grow and support the housing needs of a number of household groups.

13.104 Outside of London, we are not aware of any planning authorities that have a specific adopted co-living policy. Manchester City Council has developed an interim co-living policy and has made clear that an initial ceiling of up to 5,000 units to evaluate and test the market for co-living housing. As noted, there is now adopted policy at the pan-London level as well as in a number of London Boroughs in the context where a number of schemes are already fully operational in London.

13.105 The London Plan under Policy H16 relating to large-scale purpose-built shared living provides guidance on co-living developments. The London Plan recognises that these developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. It refers principally to schemes which are generally of at least 50 units

and provide an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service.

13.106 In addition to the London Plan, a number of London Boroughs have or are developing specific local planning policies to respond to co-living schemes as they become more of a focal point for developers in the private rented sector. This includes Hackney and Lambeth which were the first two to progress with local policy on the sector. In both instances, as examples, the Councils acknowledged the principle of purpose-built, large-scale shared living, in line with the London Plan policy – noting a scale of 50 units in Hackney and 30 units in Lambeth. A range of criteria is set out including the requirement that it meets an identified need.

13.107 In Manchester, the City Council has recognised a need to be open to innovative housing models in an interim policy statement whilst setting an ‘initial ceiling’ of 5,000 units to be tested against a number of criteria, policies and specific standards in line with existing planning policy. The initial ceiling is intended to enable the Council to evaluate the suitability of co-living development at a manageable scale, and the contribution co-living can make to its core objectives.

13.108 Drawing on the policy frameworks established in the London Plan, the Council should construct a policy which supports high-quality co-living schemes where:

1. it is of good quality and design and adhere to minimum space standards⁴⁶;
2. it is located centrally and is well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;
3. it is under single management;
4. The facility has a concierge or other adequate safety and security personnel;
5. its units are all for rent with minimum tenancy length of no less than three months;
6. communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) convenient access to a communal kitchen with adequate facilities to meet the needs of all residents;
 - b) outside communal amenity space (roof terrace and/or garden);
 - c) internal communal amenity space (dining rooms, lounges) ;
 - d) laundry and drying facilities;
7. the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes

⁴⁶ Nationally Described Space Standards

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8. a management plan is provided with the application
 9. it delivers a level of affordable housing (discounted private rent) (set at viable levels) or up-front cash in lieu of a contribution towards affordable housing or an annual contribution in perpetuity.

13.109 As set out it is expected that co-living schemes could be delivered in the main urban areas of Coventry, Warwick and Rugby where there is a core demographic and tenant profile which would align with the target market of co-living housing. These areas are also well connected to local services and transport and would help support the night-time economy in conjunction with the existing student population.

13.110 The policy could expect that schemes would be under single management and offer rent with a minimum tenancy of no less than 3 months as well as align with local planning policies and space standards.

13.111 Other local authorities have encouraged co-living development where it is located next to growth areas or major centres of employment, it meets zero-carbon objectives, where students are precluded from the development and where it applies maximum tenancy lengths. These can be further considerations for the Councils to draw on when developing policies.

13.112 As noted previously, Manchester City Council has also limited the number of co-living developments in the City to 5,000 units⁴⁷ to “allow the Council to evaluate the suitability of this type of development at a manageable scale, and the contribution these facilities can make to our core objectives.” The three selected authorities could consider a similar approach.

Student Housing Needs

13.113 This section considers the housing needs of students across the Coventry and Warwickshire area drawing on the existing profile of students and the expected growth in student numbers and purpose built student accommodation gleaned from our core analysis and discussions with key stakeholders.

13.114 The Framework is clear that the needs of students, as a key household group, should be assessed and reflected in planning policies.

The Existing Profile of Student Housing Need

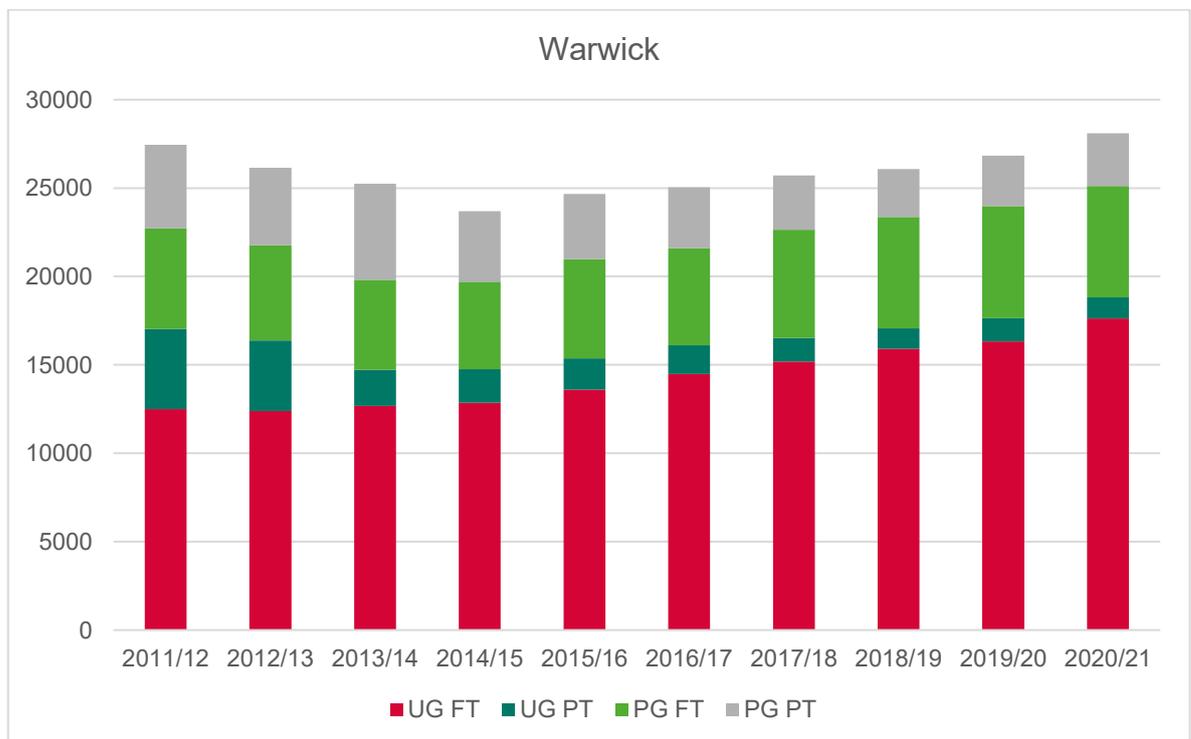
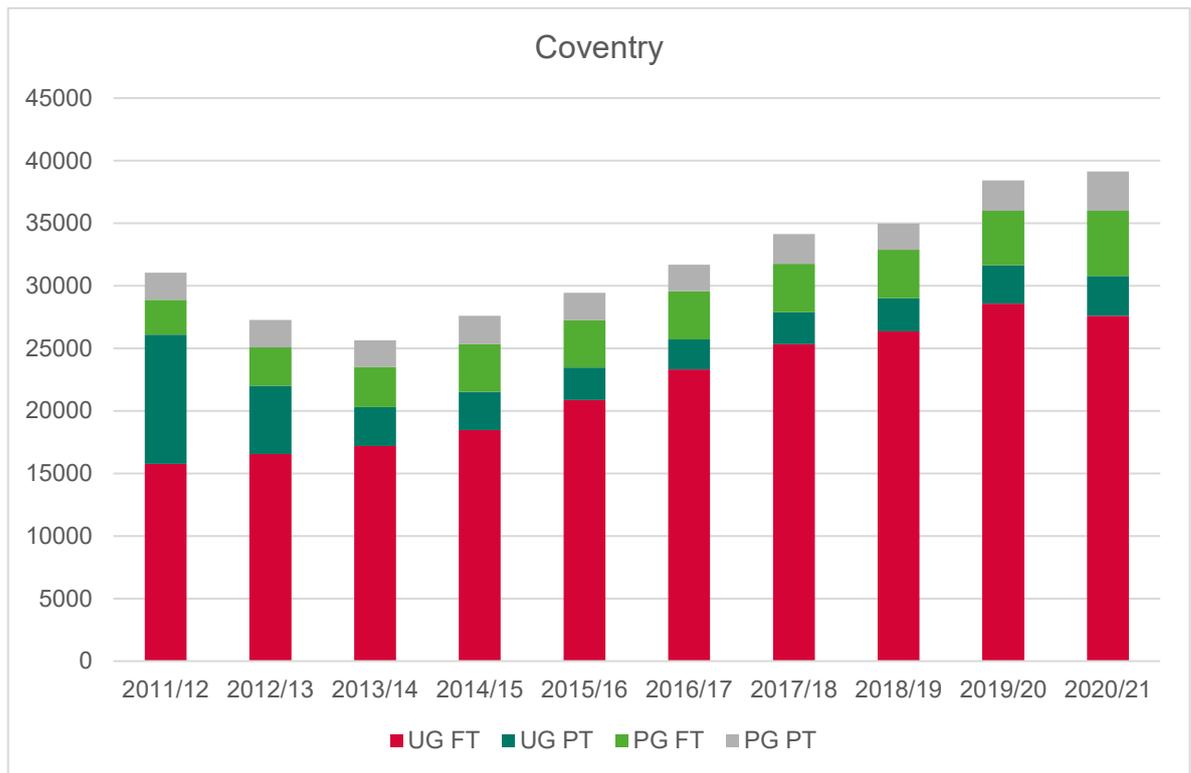
13.115 Across the study area, at the point of the 2011 Census, there were around 47,950 full time students aged 18 and over. The area has two higher education (“HE”) establishments which are relevant to this assessment: Coventry University and Warwick University. The study area also has a number of

⁴⁷ <https://democracy.manchester.gov.uk/documents/s17815/Co-living%20in%20Manchester.pdf>

colleges; however, the data allowing us to track trends in student numbers year-on-year for further education establishments is not consistently available. In any event, it is HE students which principally impact on the housing market, and therefore the assessment focuses on the two Universities.

- 13.116 IcenI has access to data allowing us to track trends in student numbers for Coventry University and Warwick University from the Higher Education Statistics Agency (“HESA”). Drawing on data from the HESA, the Figures below set out the pattern of growth over the last 10 years from 2011/12 to 2020/21. In the academic year 2020/21, the two Universities had a combined total of 67,245 full-time (“FT”) and part-time (“PT”) Undergraduate (“UG”) and Postgraduate (“PG”) students.
- 13.117 As is clear from the first graph, the student population decreased notably at Coventry University in the years following the introduction of the tuition fee rise in 2012; however, since a low of 25,630 students in 2013/14, student growth has increased significantly over the period to 2020/21 with an additional 13,510 students or 53% growth. The majority of this growth has been in FT UG students (i.e. over 10,000 additional students equal to 61% growth). In 2020/21, the University had a total of 39,140 students; however, it should be noted that Coventry University has a number of campuses outside of Coventry City including in London and Scarborough which are captured in this figure.
- 13.118 Turning to Warwick University, the second graph shows that post tuition fee increases, student growth decreased year-on-year to 2014/15 to reach a low of 23,685 students before increasing steadily over the period to 2020/21 with 19% growth across all student groups. However, all growth has been focussed on FT students with an increase of 37% and 28% in UG and PG students respectively.

Figure 13.10: Profile of Student Population, 2011-21

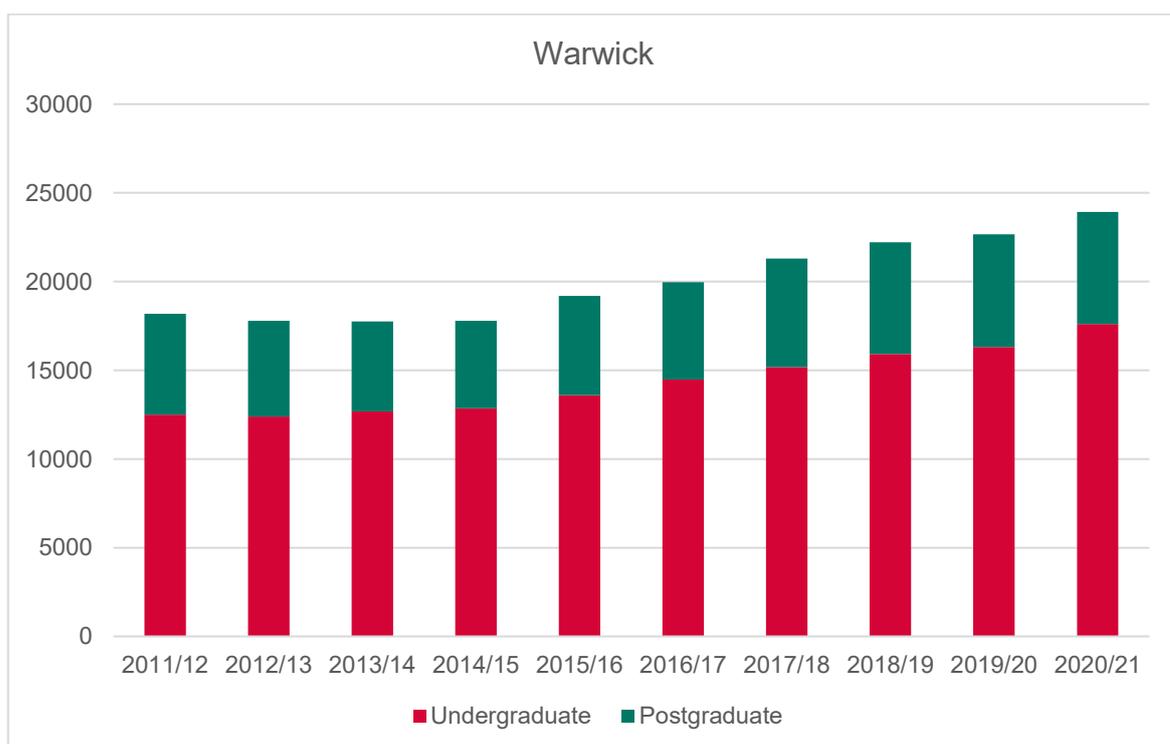
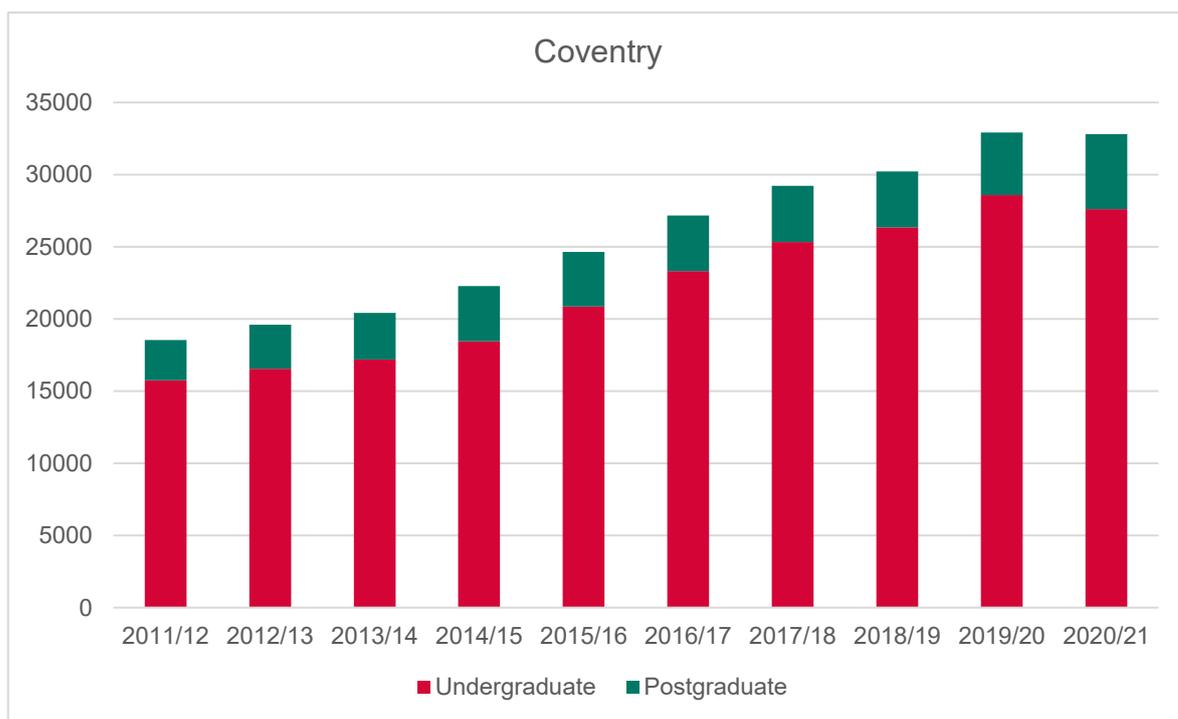


Source: HESA 2021

13.119 Recognising that housing needs arise principally as a result of FT students with those studying PT typically also living and working locally already or living with parents; we have drilled into this group specifically.

13.120 At Coventry University, the number of FT UG students grew over the 2011-21 period by 10,420 whilst the number of FT PG students grew by 1,980 totalling an additional 14,270 FT students. At Warwick University, the number of FT UG grew over the 2011-21 period by 4,765 students whilst the number of FT PG increased by 1,365 totalling 5,735 students. In 2020/21, Coventry University had 32,810 FT students and Warwick University had 23,920 FT students.

Figure 13.11: Trends in Full Time Higher Education Students



13.121 Finally, in respect of the profile of students, we note that there has also been a significant change in the origin of Coventry University's students with a notable increase in the number of international students with growth of 98% for EU students and 121% for non-EU students. Warwick University has also seen an increase in EU and non-EU students; however, the growth in relative terms has been to a much lesser extent.

Table 13.8 Change in Domicile of Students, 2011-2021

	Domicile	2011/12	2020/21	Change	%
Coventry University	UK	24,630	25,380	750	3%
	EU	1,915	3,800	1,885	98%
	Non-EU	4,505	9,960	5,455	121%
Warwick University	UK	18,650	17,805	-845	-5%
	EU	2,195	2,730	535	24%
	Non-EU	6,590	7,575	985	15%

Source: HESA 2021

13.122 Financially it is more lucrative for the universities to attract non-EU students and historically this has been in the main Chinese and Indian students. At a national level the number of Chinese students has fallen as a result of the pandemic while the Indian market has strengthened on the basis of increased numbers of post-study work visas.

The Profile of Accommodation

13.123 At the point of the 2011 Census, there were around 47,950 full time students aged 18 and over in the study area. In comparison, both Universities had 36,725 students in total in 2011/12. The Table below sets out a breakdown of students resident in each authority by age. Reflecting the location of both Universities, Coventry and Warwick had a significantly higher number of FT students.

Table 13.9 Profile of Full Time Students Aged 18 and Over

	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Coventry
Aged 18-19	582	1,277	1,048	1,212	2,432	9,139
Aged 20-24	357	781	488	704	5,912	13,977
Aged 25 and Over	285	741	595	550	1,654	6,214
Total (No.)	1,224	2,799	2,131	2,466	9,998	29,330

Source: 2011 Census

13.124 The Table below sets out the accommodation profile of FT students at the point of the 2011 Census across Coventry and Warwickshire. This shows that the largest proportion of students aged 18 and over lived with parents in the non-University authority areas of North Warwickshire, Nuneaton and Bedworth, Rugby and Stratford-on-Avon. In these areas, the second most popular option was "other households" which includes living in a family household (i.e. living with a spouse, partner or child).

13.125 In Warwick District and Coventry City, the majority of students lived in all-student households, which principally comprise Houses in Multiple Occupation (“HMOs”). There was also a high proportion in each area living in University Halls as well as living either with parents or with a spouse or partner; however, in Warwick District almost half (48%) lived in HMOs and over a third (38%) in Coventry City lived in HMOs.

Table 13.10 Profile of Full Time Students Aged 18 and Over by Accommodation Type (%)

	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Coventry
Living with Parents	75%	67%	60%	57%	16%	19%
University Communal	0%	0%	0%	0%	17%	23%
Other Communal	0%	0%	5%	10%	1%	1%
All Student Household	4%	6%	8%	10%	48%	35%
Living Alone	2%	4%	3%	4%	4%	7%
Other	19%	23%	24%	19%	14%	15%

Source: 2011 Census

13.126 It is notable that significant numbers of students residing in HMOs can lead to the dominance and concentration of HMOs in particular areas. Although it is not uncommon for areas with a high population of students to have a number of all student HMOs, it is important that a mix of residential accommodation be maintained within the neighbourhood. In particular:

- Student populations are transient and thus concentrations of HMOs can create relatively transient communities of people with a high population turnover. This can, in some circumstances, lead to issues of environmental upkeep and fly-tipping, as well as 'ghost' neighbourhoods in summer months.
- Areas with concentrations of HMOs are those in which there is an above average proportion of properties owned by landlords rather than owner occupiers. This can result in reduced investment in the upkeep of properties, which can lead to a general downward trend in neighbourhood quality.
- Growth in student HMOs within an area can inhibit the availability and supply of homes for other groups within the population, such as for families.

13.127 Coventry City Council have commissioned a separate report to drill into issues around student housing dynamics and HMO properties which will be published alongside the main HEDNA in due course.

Expected Student Growth and Provision of PBSA

- 13.128 This sub-section reflects discussions between IcenI and the respective Universities which were focussed on understanding the latest profile of current students and expected student growth as well as our review of planned provision of PBSA. The dynamic between the Universities' expansion plans, growth in student numbers and the provision of PBSA is critical to determining whether additional provision is necessary moving forward.
- 13.129 It should however be noted upfront that due to funding cycles, the Universities typically only plan ahead five years. There has also been a need to revisit strategies and masterplanning in a post-Covid world which has caused delays with bringing firm plans forward. It is therefore difficult at the time of writing to draw any firm conclusions from these discussions.

Coventry University

- 13.130 As set out, in the academic year 2020/21, Coventry University had a total of 39,140 students as part of its wider "group" which includes campuses in London and Scarborough as well as Coventry. Through discussions with the University, we understand that around 28,000 students of the global total study on courses at the Coventry campus.
- 13.131 The University owns accommodation on-campus equal to around 2,500 bedspaces which are principally aimed at first year students alongside a number of other specific groups. The latest position with regards to capacity is that around 2,200 bedspaces are occupied at the time of writing. In addition to the on-campus bedspaces, the University is also supporting 80 tenancies of students living in HMO accommodation with the University's accommodation team noting that a high number of students are choosing to live in PBSA with this trend increasing year-on-year as more of this accommodation comes forward.
- 13.132 IcenI has drilled into data gathered by HESA to better understand students' term-time accommodation preferences. This has been split out between first year UG, returning UG and all PG students; recognising that there is a distinct difference in preference between these main groups. However, it should again be noted that the data is skewed by the "group" total and the other University campuses and the data should be treated with caution – particularly around University owned halls.

Table 13.11 Coventry University Full-Time Student Term-Time Accommodation (%)

Accommodation	First Year UG	Returning UG	All PG
University Owned Halls	23%	33%	15%
Private Sector Halls	6%	8%	4%
Parents Home	27%	24%	11%
HMOs	15%	17%	32%
Own Residence	14%	13%	13%
Other	7%	5%	11%
Not Known	8%	1%	14%

Source: HESA, 2020/21

- 13.133 As is clear, there is a high proportion of UG students living in University Halls with around a quarter (23%) of first year UG students living in Halls owned by Coventry University. The majority (27%) of first year UGs live with parents with a high proportion also living in all students households or HMOs; as well as PBSA – which is taken to include both private sector halls and partly those with their “own residence” as this includes renting. The majority of PG students live in HMOs with a high proportion also expected to be living in PBSA.
- 13.134 The University has experienced notable growth over the last decade becoming the fastest growing University in the UK which is detailed upfront in this section. This has been driven by a significant investment programme over the last ten years including the development of the Alison Gingell Building which provides state of the art health simulation to support health and life science courses. This has been coupled with the development of new accommodation including Bishop Gate and Godiva Place which both opened in 2018 providing 725 and 772 en-suite bedrooms and studios for students respectively.
- 13.135 Icenis has reviewed the University’s Corporate Strategy 2030 and has discussed growth plans with the University’s accommodation team; however, we have been unable to confirm specific numbers with regards to the expected student population over the coming years. Nevertheless, it has been confirmed through our discussions that the University will continue to focus on both UG and PG students and the opportunity for progression from UG to PG courses. The University also expects the shift to a rising number of international students to continue moving forward with the international market being another focus. Nevertheless, at this stage, it is expected that student numbers will remain static for the next 2-3 years.
- 13.136 The Table below shows the number of bedspaces approved and due to be delivered in Coventry City over the next three years. In total, around 9,275 bedspaces are due to be completed which is a significant volume of development for the student housing sector. 4,819 bedspaces have been delivered in the last three years. There are currently no further PBSA schemes anticipated after 2023/24.

Table 13.12 Purpose-Built Student Accommodation, Bedspaces

	Completed	Committed
2017/18	0	
2018/19	2,602	
2019/20	2,217	
2020/21	0	
2021/22		5,449
2022/23		2,825
2023/24		1,000

- 13.137 Taken together, alongside the total amount of PBSA already in the City including University owned Halls – estimated to be around 16,000 bedspaces in total based on research undertaken by Coventry University – there is a significant volume of PBSA for students on the ground and in the pipeline.
- 13.138 In the short-term, with the volume of PBSA in the pipeline due to be delivered in the next 3 years and the expectation that student numbers will remain static, it does not appear that there is a need for intervention. However, the University’s plans to continue to grow the international student population could have an impact on housing needs in the medium to long-term. Through our discussions, it is also our understanding that there is an increasing number of students opting for PBSA as opposed to sharing with other students in HMOs due to the higher and improving quality of this form of stock – this will have to be closely monitored.
- 13.139 The Council should continue to liaise with the University as appropriate to ensure that the supply of PBSA over the long-term does not flood the market and a balance is struck. A separate study being commissioned by Coventry City Council will drill into these issues and consider the potential for reusing surplus PBSA for to house other household groups.

Warwick University

- 13.140 In the academic year 2020/21, Warwick University had a total of 28,105 students. Through our discussions with the University’s accommodation team, we understand that the student population increased to around 29,550; however, this data is not yet available via HESA. The University guarantees accommodation for first year UG students as well as a small proportion of other student groups.
- 13.141 In total, the University houses 7,500 students on-campus which the accommodation states is sufficient supply to home all students that require it in line with the student allocation policy. Students attending the University (i.e. excluding distance learners equal to around 4,00 students) either live on-campus, in Coventry City or in Warwick District with students in the latter living principally in Leamington. The University states that around 6,000 Warwick University students live in Leamington.

13.142 Icení has again drilled into data gathered by HESA to better understand students' term-time accommodation preferences. As expected, this shows that the majority of first year UG students live in one of the 7,500 bedspaces on-campus with returning UG students and PG living in HMOs or PBSA.

Table 13.13 Warwick University Full-Time Student Term-Time Accommodation (%)

Accommodation	First Year UG	Returning UG	All PG
University Owned Halls	85%	18%	24%
Private Sector Halls	0%	2%	3%
Parents Home	5%	4%	15%
HMOs	3%	53%	31%
Own Residence	2%	9%	12%
Other	2%	12%	9%
Not Known	2%	2%	7%

Source: HESA, 2020/21

13.143 As is the case in Coventry City, there has been a focus on delivering large quantities of PBSA albeit to a much smaller scale in absolute terms. The University's accommodation team has stated that all of the PBSA built on the collar of the University is full; also noting that, in line with the trend in Coventry, more students are choosing to live in PBSA as opposed to HMOs.

13.144 It was also noted however that for Warwick students, Coventry City is seen as being too far with the preference to be on or very close to campus or alternatively, live in Leamington owing to the area's character and appearance, as well as nightlife. As a result, the bulk of the PBSA market in Coventry City is being taken up by Coventry University students only.

13.145 The Table below sets out PBSA schemes delivered in recent years and shows that 929 bedspaces have been delivered since 2017/18 and there is forthcoming provision for another 292 bedspaces in Warwick District in the coming years.

Table 13.14 Purpose-Built Student Accommodation, Bedspaces

	Completed	Committed
2017/18	329	
2018/19	148	
2019/20	275	
2020/21	177	
2021/22		92
2022/23		200
2023/24		0

13.146 The University is currently in the midst of developing its Strategy looking ahead to 2030 and is due to share its draft strategy and accompanying masterplan with the District Council in spring 2022. The document will include a target number with regards to student growth; however, at this stage, Iceni has been informed that the University intends to increase numbers at a “sustainable moderate growth” rate. The approach to housing all first year UG students will be maintained and there is a desire to also offer some additional accommodation to returning students.

13.147 In terms of the impact on housing, it is not clear at this stage due to the ongoing development of the University Strategy and Masterplan and as stated, the University has confirmed that they are currently working to develop the Strategy and are engaged with Warwick District Council in doing so. The Council should therefore continue to work with the University and monitor the situation until a clear vision is established.

The Policy Response

13.148 Overall, it is clear that Coventry City and Warwick District and their respective Universities has seen significant growth in students over the last decade; and the growth has been particularly in full-time students which have the greatest impact on the housing market. Over the 2011-21 period, Coventry University increased its full-time student population by 14,270 students group-wide and Warwick University by 5,735 students.

13.149 Coventry University owns and provides for around 2,500 bedspaces whilst Warwick University has 7,500 bedspaces on-campus which are all guaranteed for first year UG students and a small proportion of other student groups. In terms of the former, the University has seen growth on the back of a significant investment programme in new facilities accompanied by student accommodation provision in the City. A substantial amount of PBSA has also come forward in the City with a significant pipeline due to be built out in the next 3 years whilst Warwick has also seen a number of PBSA schemes come forward.

13.150 Looking ahead, Coventry City intends to continue to focus on the international market and growing its international student population; however, over the next 2-3 years, it is expected that student

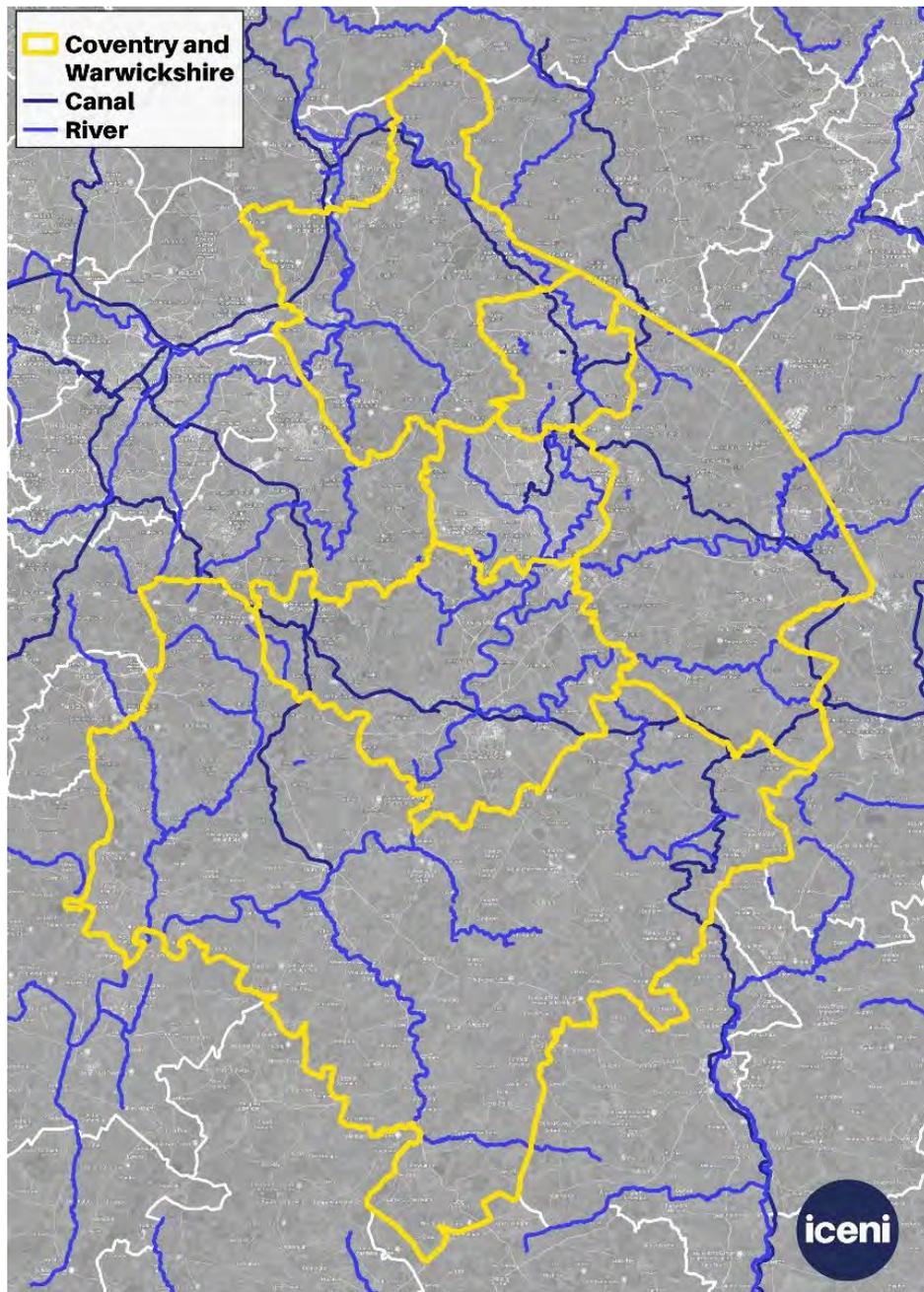
numbers will remain fairly static. As noted, there is a significant pipeline of PBSA and as a result, it is not considered that any intervention from the Council is necessary at this stage. However, as the University's Growth Strategy develops, there will be a need to revisit and engage which can be picked up as part of developing the final HEDNA.

- 13.151 Similarly, there will be a need to reconsult with Warwick University as the Strategy and accompanying masterplan is still being developed. At this stage, we have been informed that the University intends to continue with "sustainable moderate growth"; however, until the vision becomes clear, it is challenging to advise on whether any intervention is necessary. The University intends on sharing the draft plans with the District Council in spring 2022 and this will provide Iceni with the opportunity to revisit the position before the HEDNA is finalised.

Caravans and Houseboats Dwellers

13.152 According to the Canals and Rivers Trust, across the West Midlands there is 520 miles of canals and as illustrated in the map below this includes considerable coverage within the study area and in each of the local authorities.

Figure 13.13: Canals and Rivers in Coventry and Warwickshire



13.153 The Association of Inland Navigation Authorities (“AINA”) is the industry body in Great Britain for those authorities with statutory or other legal responsibility for the management and operation of navigable inland waterways.

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- 13.154 They have produced a range of reports including⁴⁸ in 2008 a survey based report titled “Numbers of Boats on the Inland Waterways”. The report recognises that “there has been a lack of definitive nationwide statistics on boat numbers, their locations, their moorings and their use.” In response AINA commissioned a study to look at two of the key components of the inland waterways - the numbers and types of boats on them and the numbers of moorings available.
- 13.155 Unfortunately, the data relating to canals in Coventry and Warwickshire was not reported but the navigation authority, British Waterways, did report for their network of 2,929 km of canals. Since that time British Waterways ceased to exist and was replaced by the Canal and River Trust.
- 13.156 The report for British Waterways shows that total boat numbers on their network grew by an average annual rate of just over 4% between 2002 and 2007. It also noted that the number of holiday hire boats remained stable over the period, but there was a significant expansion in trip, restaurant and community boats.
- 13.157 Overall, leisure business boat licenses nearly doubled over the five years. Within the private powered boat sector, growth was particularly strong amongst continuous cruisers and other residential boaters.
- 13.158 The total number of boats on the network in 2007 was 32,604 an increase of around 7,000 since 2002. This included 29,289 powered boats, 708 unpowered boats, 1,573 trip/restaurant boats, 996 hire boats and 38 unpowered day hire boats.
- 13.159 In terms of moorings the British Waterways reported that there were 24,714 moorings on their network and a further 3,100 vessels that were without a home mooring as they were in continuous use. The majority of this supply was private and 5,188 were owned by British Waterways.
- 13.160 AINA also produced a further advisory report⁴⁹ in 2011 called the “Residential Use of Inland Waterways”. This report examined those using boats as their main residential location. The report acknowledges that “there is currently a strong demand for residential moorings but a scarce supply of suitable berths”. The report provides examples of different types of vessels or structures in ‘residential use’ including
- Conventional vessels - These are boats that have originally been designed and built for navigation, the majority are cabin cruisers, narrow boats or wide-beam vessels e.g. barges.

⁴⁸ Numbers of Boats on the Inland Waterways

⁴⁹ <https://aina.org.uk/wp-content/uploads/2018/04/RUIW-Feb11.pdf>

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- Vessels not capable of navigation - Vessels that have been modified (e.g. engines removed and/or interior altered) and vessels that are simply too large to navigate the waterway
 - Floating structures not capable of navigation - Simply accommodation constructed to float on water.
 - Houseboat - A static vessel or purpose-built floating structure with no form of mechanical propulsion used, or designed for use, for residential purposes.

13.161 However, the report recognises that the term “houseboat” is sometimes used to refer to any of the other types of vessels and structures that are in residential use. The report also provides an outline of each the different types of moorings. These are

- Long-term / home mooring / mooring base - This is a mooring which comprises the usual ‘parking place’ for a vessel, from which it may or may not go cruising. This type of mooring will often be allocated to and/or occupied by a single identifiable vessel for a long period (e.g. one year or longer).
- Residential mooring - This is a long-term/mooring base for a vessel or floating structure with planning permission and navigation authority consent for use as a person’s sole or main residence. The vessel may leave the mooring from time to time to go cruising, undergo repair etc. for any period of time.
- Visitor / short-stay mooring - This type of mooring is specifically designated for boats to stop off or stay at for short periods whilst out cruising, usually for a maximum specified period.
- Casual mooring – this type of mooring occurs where boats tie up casually anywhere along the towpath or riverbank. Usually there is a general rule specifying the maximum period for casually mooring in one place (e.g. up to 14 days on waterways owned and managed by British Waterways)

13.162 The report notes that the 2008 boaters’ survey conducted by British Waterways included the question “Is your boat your main residence?” and that 18% answered yes as main or Monday-Friday residence, and extrapolating this to the approximately 30,000 privately licensed boats, British Waterways estimates that approximately 5,400 boats on its waterways are used for residential purposes.

13.163 If this number increased by 4% each year as was the estimated growth in the 2002 – 2007 period then there would be 8,991 boats used as a main residence. Extrapolating this figure further to 2040 would result in an increase to 18,994 boats used as a main residence.

13.164 Although this is purely an extrapolation and there is no evidence to suggest how high this number actually is or will be. Furthermore, these figures are for the whole British Waterways Network which Coventry and Warwickshire only comprises a small but notable part of.

13.165 The report then goes on to make a number of recommendations including:

“Some minority household groups are the subject of planning guidance such as Circulars, and a similar approach could help to ensure that the relevant issues specific to people living afloat are appropriately addressed by local authorities in both local housing and planning policy making as well as in development control.

Local authorities therefore have a responsibility to make well-informed planning decisions, using all the ‘tools’ available to them, including this advisory document. They should consult the relevant navigation authority and take into account their statutory duties, policies and any guidelines and local plans. They should also engage with all stake-holders at an early stage to understand the range of issues.

More generally, planning for residential moorings is most suitably dealt with when developing waterway strategies, local area development plans or similar; these plans should consider all types of moorings (residential, leisure, commercial and visitor moorings) and make appropriate provision for them within a local strategic context”

13.166 The Canal and River Trust have recently published⁵⁰ their annual report for the West Midlands. This noted that in 2020/21 there was record numbers of boat movements and that 7,386 boats use the canals each year. This would equate to around one quarter of the boats on the British Waterways network in the 2007.

13.167 To illustrate the supply and demand of moorings in the study area we have used the Canal and River Trusts Waterside Moorings search function.⁵¹ This is based on a five mile radius from a search location as such there will be some overlap and also some supply outside of the area (which we have sought to minimise as much as possible). As shown in the Table below, there are only 4 available moorings out of 138 in the five miles from each boroughs main settlement.

⁵⁰ <https://canalrivertrust.org.uk/refresh/media/original/44126-west-midlands-annual-report-2020-21.pdf>

⁵¹ <https://www.watersidemoorings.com/Search?DistanceMiles=0&Coordinates=55.3781%2C->

3.436&tab=&Availability=availablenow&Availability=availablesoon&Availability=occupied&BerthUse=Leisure&BerthUse=Residential

Table 13.15 Moorings within 5 Mile Radius of Major Settlements, Nov 2022

	Available	Occupied	Total
Atherstone ⁵²	0	27	27
Coventry	0	42	42
Coleshill	2	23	25
Nuneaton	0	13	13
Rugby	2	13	15
Stratford-upon-Avon	0	11	11
Warwick	0	5	5
Total	4	132	138

Source: Canal and River Trust

13.168 Given the growing demand for moorings and the relatively low level of vacancies the Councils should work with the relevant authorities (Canal and River Trust) to identify additional residential moorings in the study area.

⁵² Includes 2 occupied moorings at Alvecote Marina

14. HOUSING NEEDS OF OLDER PEOPLE & THOSE WITH DISABILITIES

Introduction

- 14.1 This section studies the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. It responds to Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019. It includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).

Understanding the Implications of Demographic Change

- 14.2 The population of older persons is increasing, and this will potentially drive a need for housing which is capable of meeting the needs of older persons. Initially below a series of statistics about the older person population of Coventry-Warwickshire are presented.

Current Population of Older People

- 14.3 The table below provides baseline population data about older persons in the study area and compares this with other areas. The population data has been taken from the 2021 Census and shows Coventry-Warwickshire has a similar age structure to other areas with 18% of the population being aged 65 and over.

Table 14.1 Older Persons Population, 2021

	Coventry-Warwickshire	West Midlands	England
Under 65	81.6%	81.2%	81.6%
65-74	9.5%	9.9%	9.8%
75-84	6.4%	6.4%	6.1%
85+	2.4%	2.5%	2.4%
Total	100.0%	100.0%	100.0%
Total 65+	18.4%	18.8%	18.4%
Total 75+	8.8%	8.9%	8.6%

Source: 2011 Census

- 14.4 The table below shows the same information for local authorities, this shows some notable variation in the proportion of people aged 65 and over, ranging from 15% in Coventry, up to 25% of the population of Stratford-on-Avon.

Table 14.2 Older Persons Population, 2021 – local authorities

	Under 65	65-74	75-84	85+	Total	Total 65+	Total 75+
Coventry	85.4%	7.6%	5.0%	2.0%	100.0%	14.6%	7.0%
North Warwickshire	78.1%	11.9%	7.4%	2.6%	100.0%	21.9%	10.0%
Nuneaton & Bedworth	80.9%	10.3%	6.5%	2.2%	100.0%	19.1%	8.8%
Rugby	81.9%	9.2%	6.6%	2.4%	100.0%	18.1%	8.9%
Stratford-on-Avon	74.8%	12.9%	8.9%	3.4%	100.0%	25.2%	12.3%
Warwick	81.1%	9.6%	6.5%	2.7%	100.0%	18.9%	9.2%
Warwickshire	79.5%	10.7%	7.2%	2.7%	100.0%	20.5%	9.9%
Coventry-Warwickshire	81.6%	9.5%	6.4%	2.4%	100.0%	18.4%	8.8%

Source: 2011 Census

Projected Future Change in the Population of Older People

14.5 Population projections can next be used to provide an indication of how the number of older persons might change in the future with the table below showing that Coventry and Warwickshire is projected to see a notable increase in the older person population. Using the trend-based projection developed the increase in the population aged 65 and over is around 18% - the population aged Under 65 is in contrast projected to increase by just 4%.

14.6 In total population terms, the projections show an increase in the population aged 65 and over of 32,400 people. This is against a backdrop of an overall increase of 60,600 – population growth of people aged 65 and over therefore accounts for 54% of the total projected population change.

Table 14.3 Projected Change in Population of Older Persons, 2022 to 2032 – trend-based projection

	2022	2032	Change in population	% change
Under 65	773,293	801,480	28,186	3.6%
65-74	90,924	106,300	15,376	16.9%
75-84	62,125	72,266	10,141	16.3%
85+	23,686	30,614	6,928	29.2%
Total	950,029	1,010,661	60,632	6.4%
Total 65+	176,736	209,181	32,446	18.4%
Total 75+	85,811	102,881	17,069	19.9%

Source: Demographic Projections

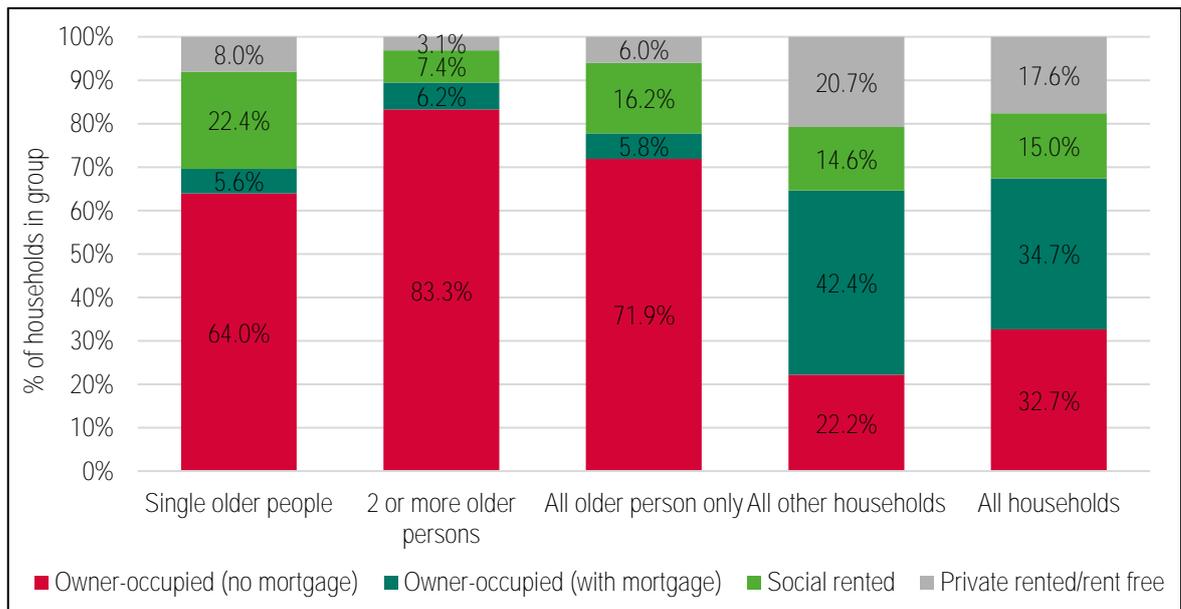
Characteristics of Older Person Households

14.7 The figure below shows the tenure of older person households. The data has been split between single older person households and those with two or more older people (which will largely be couples). The data shows that the majority of older persons households are owner occupiers (78% of older person households), and indeed most are owner occupiers with no mortgage and thus may

have significant equity which can be put towards the purchase of a new home. Some 16% of older persons households across the study area live in the social rented sector; the proportion of older person households living in the private rented sector is relatively low (about 6%).

14.8 There are also notable differences for different types of older person households with single older people having a much lower level of owner-occupation than larger older person households – this group also has a much higher proportion living in the social rented sector.

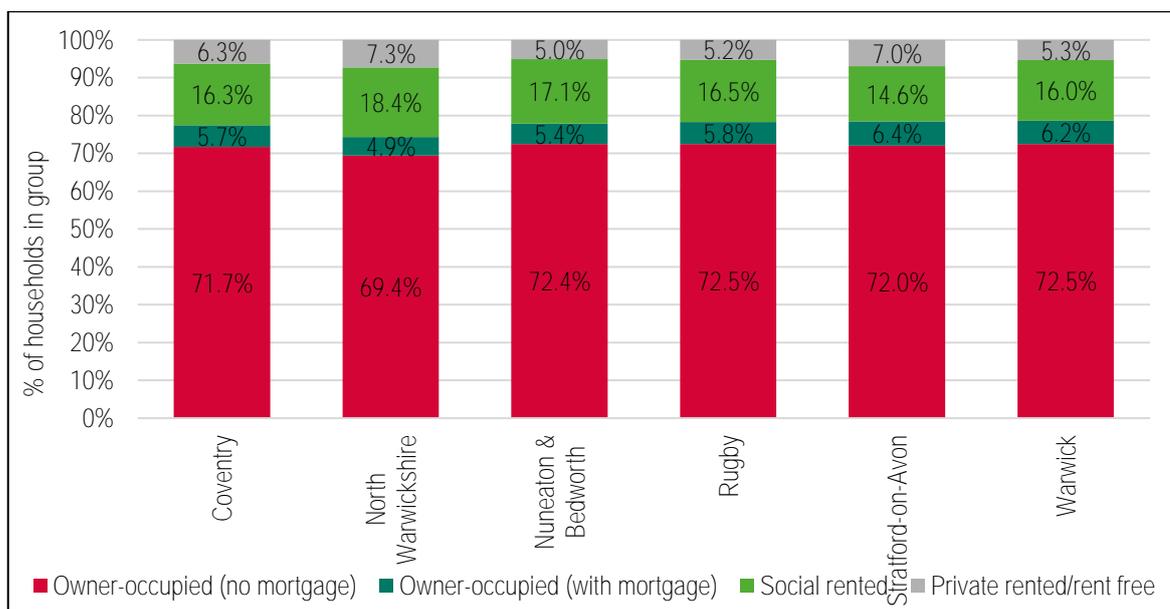
Figure 14.1: Tenure of Older Persons Households in Coventry-Warwickshire, 2011



Source: 2011 Census

14.9 The figure below shows the same information for local authorities – the data is provided for all older person households. The data shows that the tenure profile of older person households is similar across the study area, with all locations seeing the majority of older person households being owners-occupiers and low numbers in the private rented sector.

Figure 14.2: Tenure of Older Persons Households in Coventry-Warwickshire, 2011 – local authorities



Source: 2011 Census

Prevalence of Disabilities

14.10 The table below shows the proportion of people with a long-term health problem or disability (LTHPD) drawn from 2011 Census data, and the proportion of households where at least one person has a LTHPD. The data suggests that some 32% of households in Coventry-Warwickshire contain someone with a LTHPD. This figure is slightly lower than seen regionally, and virtually the same as the national average. The figures for the population with a LTHPD also typically show the same trends when compared with other locations – some 17% of the population having a LTHPD.

Table 14.4 Households and People with a Long-Term Health Problem or Disability, 2011

	Households Containing Someone with a Health Problem		Population with a Health Problem	
	No.	%	No.	%
Coventry-Warwickshire	115,721	32.2%	149,420	17.3%
West Midlands	810,722	35.3%	1,062,064	19.0%
England	7,217,905	32.7%	9,352,586	17.6%

Source: 2011 Census

14.11 The analysis also shows some differences between different parts of the study area, with Nuneaton & Bedworth seeing a higher proportion of population and households with a LTHPD.

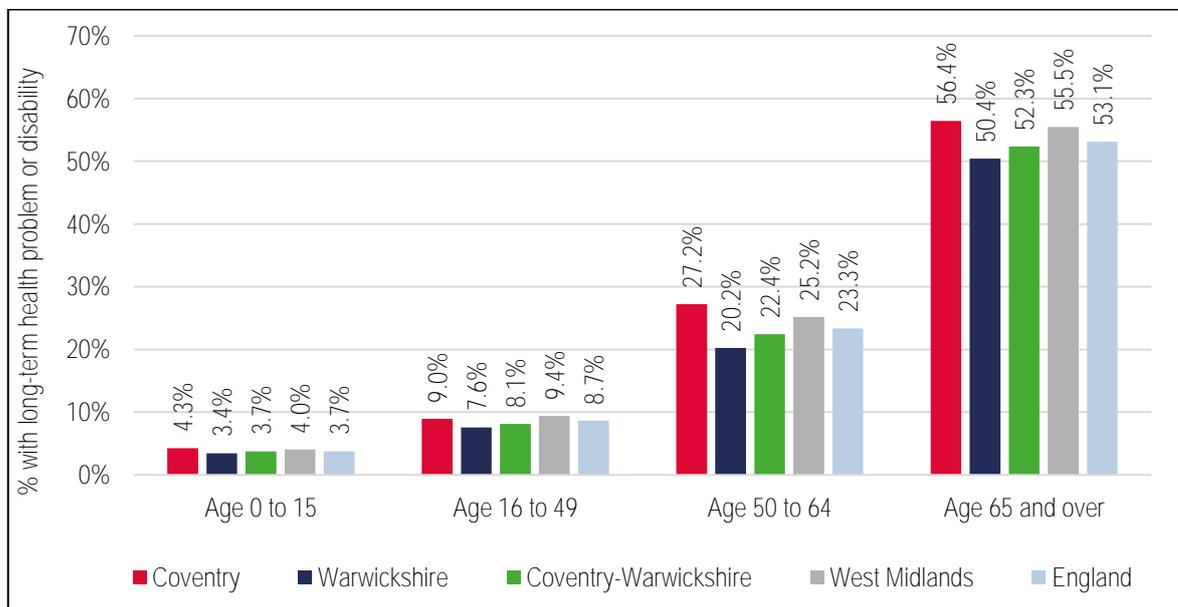
Table 14.5 Households and People with a Long-Term Health Problem or Disability, 2011 – sub-areas – Coventry-Warwickshire

	Households Containing Someone with a Health Problem		Population with a Health Problem	
	No.	%	No.	%
Coventry	43,584	33.9%	56,247	17.7%
North Warwickshire	9,061	35.1%	11,936	19.2%
Nuneaton & Bedworth	18,669	35.4%	24,379	19.5%
Rugby	12,581	30.0%	16,114	16.1%
Stratford-on-Avon	15,784	30.4%	20,334	16.9%
Warwick	16,042	27.3%	20,410	14.8%
Warwickshire	72,137	31.2%	93,173	17.1%
Coventry-Warwickshire	115,721	32.2%	149,420	17.3%

Source: 2011 Census

14.12 As noted, it is likely that the age profile will impact upon the numbers of people with a LTHPD, as older people tend to be more likely to have a LTHPD. The figure below shows the age bands of people with a LTHPD. It is clear from this analysis that those people in the oldest age bands are more likely to have a LTHPD. The analysis also typically shows higher levels of LTHPD in each age band in Coventry when compared with the regional and national position.

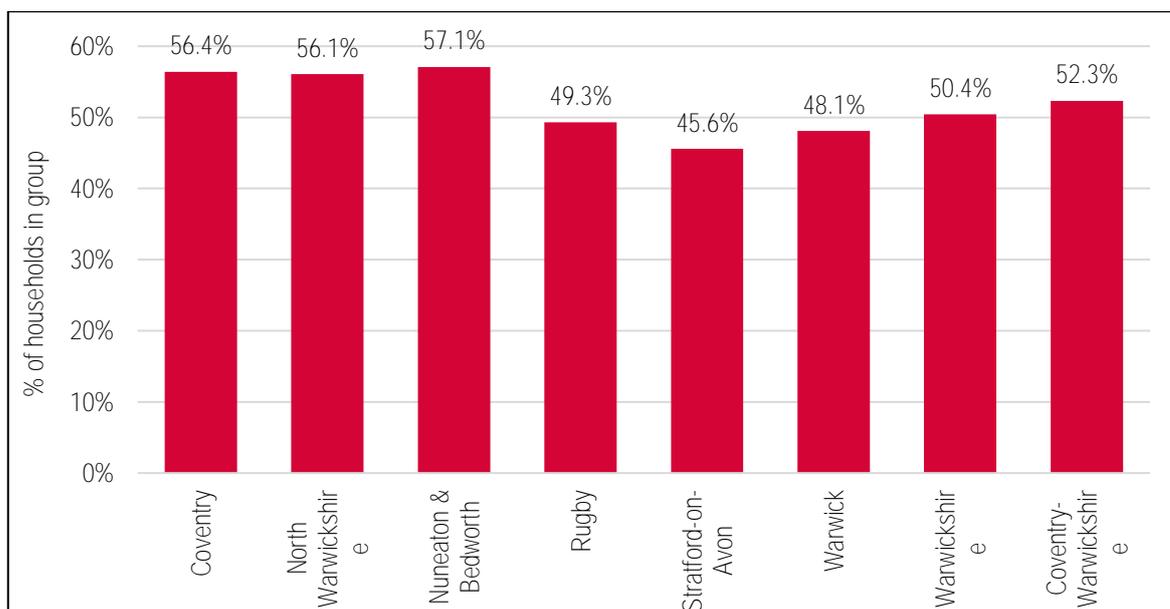
Figure 14.3: Population with Long-Term Health Problem or Disability by Age



Source: 2011 Census

14.13 The figure below shows the proportion of the population aged 65 and over with a LTHPD by local authority – this shows higher levels of disability in Coventry and Nuneaton & Bedworth, with much lower figures in Stratford-on-Avon and Warwick.

Figure 14.4: Proportion of population aged 65 and over with a Long-Term Health Problem or Disability – local authorities



Source: 2011 Census

Health Related Population Projections

- 14.14 The incidence of a range of health conditions is an important component in understanding the potential need for care or support for a growing older population.
- 14.15 The analysis undertaken covers both younger and older age groups and draws on prevalence rates from the PANSI (Projecting Adult Needs and Service Information) and POPPI (Projecting Older People Population Information) websites. Adjustments have been made to take account of the age specific health/disabilities previously shown.
- 14.16 Of particular note are the large increases in the number of older people with dementia (increasing by 21% from 2022 to 2032 and mobility problems (up 20% over the same period). Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population. When related back to the total projected change to the population, the increase of people aged 65+ with a mobility problem represents 11% of total projected population growth.
- 14.17 It should be noted that there will be an overlap between categories (i.e. some people will have both dementia and mobility problems). Hence the numbers for each of the illnesses/disabilities should not be added together to arrive at a total.

Table 14.6 Projected Changes to Population with a Range of Disabilities – Coventry-Warwickshire

Disability	Age Range	2022	2032	Change	% Change
Dementia	65+	12,143	14,720	2,577	21.2%
Mobility problems	65+	31,912	38,350	6,438	20.2%
Autistic Spectrum Disorders	18-64	5,502	5,857	355	6.4%
	65+	1,626	1,933	307	18.9%
Learning Disabilities	15-64	14,244	15,062	818	5.7%
	65+	3,609	4,234	624	17.3%
Challenging behaviour	15-64	261	275	14	5.5%
Impaired mobility	16-64	29,111	29,753	642	2.2%

Source: POPPI/PANSI and Demographic Projections

- 14.18 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes and those who choose to move into supported housing.
- 14.19 The projected change shown in the number of people with disabilities provides clear evidence justifying delivering ‘accessible and adaptable’ homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability. The Council should ensure that the viability of doing so is also tested as part of drawing together its evidence base although the cost of meeting this standard is unlikely to have any significant impact on viability and would potentially provide a greater number of homes that will allow households to remain in the same property for longer.

Need for Specialist Accommodation for Older Persons

- 14.20 Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward. The box below shows the different types of older persons housing which are considered.

Definitions of Different Types of Older Persons' Accommodation

Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

Retirement living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.

Extra care housing or housing-with-care (housing with care): This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Source: *Planning Practice Guidance* [63-010]

- 14.21 The need for specialist housing for older persons is typically modelled by applying prevalence rates to current and projected population changes and considering the level of existing supply. There is no standard methodology for assessing the housing and care needs of older people. The current and future demand for elderly care is influenced by a host of factors including the balance between demand and supply in any given area and social, political, regulatory and financial issues. Additionally, the extent to which new homes are built to accessible and adaptable standards may over time have an impact on specialist demand (given that older people often want to remain at home rather than move to care) – this will need to be monitored.
- 14.22 There are a number of 'models' for considering older persons' needs, but they all essentially work in the same way. The model results are however particularly sensitive to the prevalence rates applied, which are typically calculated as a proportion of people aged over 75 who could be expected to live in different forms of specialist housing. Whilst the population aged 75 and over is used in the modelling, the estimates of need would include people of all ages.
- 14.23 Whilst there are no definitive rates, the PPG [63-004] notes that *'the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ for Older People Analysis Tool'*. The PPG does not specifically mention any other tools and therefore seems to be indicating that SHOP@ would be a good starting point for analysis. Since the PPG was published the Housing Learning and Information Network (Housing LIN) has removed the Shop@ online toolkit although the base rates used for analysis are known.

14.24 The SHOP@ tool was originally based on data in a 2008 report (More Choice Greater Voice) and in 2011 a further suggested set of rates was published (rates which were repeated in a 2012 publications). In 2016, Housing LIN published a review document which noted that the 2008 rates are 'outdated' but also noting that the rates from 2011/12 were 'not substantiated'. The 2016 review document therefore set out a series of proposals for new rates to be taken forward onto the Housing LIN website.

14.25 Whilst the 2016 review rates do not appear to have ever led to an update of the website, it does appear from reviewing work by Housing LIN over the past couple of years as if it is these rates which typically inform their own analysis (subject to evidence based localised adjustments).

14.26 For clarity, the table below shows the base prevalence rates set out in the various documents described above. For the analysis in this report the age-restricted and retirement/sheltered have been merged into a single category (housing with support).

Table 14.7 Range of suggested baseline prevalence rates from a number of tools and publications

Type/Rate	SHOP@ (2008) ⁵³	Housing in Later Life (2012) ⁵⁴	2016 Housing LIN Review
Age-restricted general market housing	-	-	25
Retirement living or sheltered housing (housing with support)	125	180	100
Extra care housing or housing-with-care (housing with care)	45	65	30-40 ('proactive range')
Residential care homes	65	(no figure apart from 6 for dementia)	40
Nursing homes (care bedspaces), including dementia	45		45

Source: Range of sources as identified

14.27 In interpreting the different potential prevalence rates it is clear that:

- The prevalence rates used should be considered and assessed taking account of an authority's strategy for delivering specialist housing for older people. The degree for instance which the Council want to require extra care housing as an alternative to residential care provision would influence the relative balance of need between these two housing types;

⁵³ Based on the More Choice Greater Voice publication of 2008 (https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Reports/MCGVdocument.pdf). It should be noted that although these rates are from 2008, they are the same rates as were being used in the online toolkit when it was taken offline in 2019.

⁵⁴ https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Toolkit/Housing_in_Later_Life_Toolkit.pdf

- The Housing LIN model has been influenced by existing levels of provision and their view on what future level of provision might be reasonable taking account of how the market is developing, funding availability etc. It is more focused towards publicly commissioned provision. There is a degree to which the model and assumptions within it may not fully capture the growing recent private sector interest and involvement in the sector, particularly in extra care; and
- The assumptions in these studies look at the situation nationally. At a more local level, the relative health of an area's population is likely to influence the need for specialist housing with better levels of health likely to mean residents are able to stay in their own homes for longer

14.28 Icenl and JGC have therefore sought to consider these issues and the appropriate modelling assumptions for assessing future needs. Nationally, there has been a clear focus on strengthening a community-led approach and reducing reliance on residential and nursing care – in particular focussing where possible on providing households with care in their own home. This could however be provision of care within general needs housing; but also care which is provided in a housing with care development such as in extra care housing.

14.29 We consider that the prevalence rates shown in the 2016 Housing LIN Review is an appropriate starting point; but that the corollary of lower care home provision should be a greater focus on delivery of housing with care. Having regard to market growth in this sector in recent years, and since the above studies were prepared, we consider that the starting point for housing with care should be the higher rate shown in the SHOP@ report (this is the figure that would align with the PPG).

14.30 Rather than simply taking the base prevalence rates, an initial adjustment has been made to reflect the relative health of the local older person population. This has been based on Census data about the proportion of the population aged 65 and over who have a long-term health problem or disability (LTHPD) compared with the England average. Calculations are based on comparing the proportion of people aged 65 and over with a LTHPD (56.4% in the case of Coventry) with the equivalent figure for England (53.1%). The table below also shows data from the Index of Multiple Deprivation (IMD) which is used to determine the local tenure split (discussed below).

Table 14.8 Data on health adjustments and Index of Multiple Deprivation

	% 65+ with LTHPD	Health adjustment	2019 IMD (rank of 317)
Coventry	56.4%	106.2%	81
North Warwickshire	56.1%	105.5%	155
Nuneaton & Bedworth	57.1%	107.4%	101
Rugby	49.3%	92.8%	222
Stratford-on-Avon	45.6%	85.8%	259
Warwick	48.1%	90.5%	263

Source: 2011 Census and Index of Multiple Deprivation

14.31 A second local adjustment has been to estimate a tenure split for the housing with support and housing with care categories. This again draws on suggestions in the 2016 Review which suggests that less deprived local authorities could expect a higher proportion of their specialist housing to be in the market sector. Using 2019 Index of Multiple Deprivation (IMD) data, the analysis suggests Coventry is the 81st most deprived local authority in England (out of 317). This suggests a greater proportion of affordable housing than for an authority in the middle of the range. Authorities with relatively low deprivation might therefore be expected to see a higher proportion of market housing. To be clear this is market housing within the categories described above (e.g. housing with support and housing with care).

14.32 The table below shows the prevalence rates used in analysis with adjustments for health and deprivation. This shows higher needs for affordable housing in Coventry and Nuneaton & Bedworth, with other areas having higher prevalence in the market sector. As noted, this reflects the health of the local and deprivation although it is interesting to also note that Coventry was shown above to have a much lower proportion of older people as owner-occupiers than in other locations.

Table 14.9 Prevalence rates used in analysis of older person needs – Coventry-Warwickshire (rates per 1,000 population aged 75+)

	Housing with support		Housing with care		Residential care	Nursing care
	Market	Affordable	Market	Affordable		
Coventry	40	93	21	27	42	48
North Warwickshire	54	78	28	20	42	47
Nuneaton & Bedworth	43	91	24	25	43	48
Rugby	60	56	28	13	37	42
Stratford-on-Avon	62	45	27	11	34	39
Warwick	66	47	29	12	36	41

Source: Range of sources

14.33 The tables below show estimated needs for different types of housing linked to the population projections. The analysis is separated into the various different types and tenures although it should be recognised that there could be some overlap between categories (i.e. some households might be suited to more than one type of accommodation).

14.34 Overall, the analysis suggests that there will be a notable need for both housing with support and housing with care (in both market and affordable sectors), as well as some additional nursing and residential care bedspaces. In Coventry the need is particularly for affordable housing (housing with support), with the opposite being the case in Warwickshire.

Table 14.10 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Coventry

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	40	462	970	508	104	612
	Affordable	93	1,168	2,274	1,106	245	1,350
Total (housing with support)		133	1,630	3,244	1,614	349	1,963
Housing with care	Market	21	210	514	304	55	360
	Affordable	27	855	653	-202	70	-131
Total (housing with care)		48	1,065	1,168	103	126	228
Residential care bedspaces		42	1,203	1,038	-165	112	-53
Nursing care bedspaces		48	567	1,168	601	126	726
Total bedspaces		90	1,770	2,206	436	238	673

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.11 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Warwickshire

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	58	1,913	3,560	1,647	843	2,490
	Affordable	60	5,198	3,695	-1,503	848	-655
Total (housing with support)		118	7,111	7,255	144	1,691	1,836
Housing with care	Market	27	721	1,665	944	392	1,336
	Affordable	15	477	947	470	217	687
Total (housing with care)		43	1,198	2,612	1,414	609	2,023
Residential care bedspaces		38	2,253	2,322	69	541	610
Nursing care bedspaces		43	2,261	2,612	351	609	960
Total bedspaces		80	4,514	4,934	420	1,150	1,570

Source: Derived from Demographic Projections and Housing LIN/EAC

14.35 The series of tables below provide the same information for each local authority (excluding Coventry).

Table 14.12 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – North Warwickshire

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	54	124	373	249	70	319
	Affordable	78	1,270	538	-732	101	-630
Total (housing with support)		132	1,394	911	-483	172	-311
Housing with care	Market	28	0	190	190	36	226
	Affordable	20	80	138	58	26	84
Total (housing with care)		47	80	328	248	62	310
Residential care bedspaces		42	284	292	8	55	63
Nursing care bedspaces		47	301	328	27	62	89
Total bedspaces		90	585	620	35	117	151

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.13 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Nuneaton & Bedworth

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	43	18	524	506	115	621
	Affordable	91	1,310	1,095	-215	241	25
Total (housing with support)		134	1,328	1,619	291	356	647
Housing with care	Market	24	123	284	161	62	224
	Affordable	25	82	298	216	66	282
Total (housing with care)		48	205	583	378	128	506
Residential care bedspaces		43	562	518	-44	114	70
Nursing care bedspaces		48	278	583	305	128	433
Total bedspaces		91	840	1,101	261	242	503

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.14 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Rugby

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	60	369	642	273	143	415
	Affordable	56	1,211	598	-613	133	-480
Total (housing with support)		116	1,580	1,239	-341	276	-65
Housing with care	Market	28	20	303	283	67	350
	Affordable	13	100	144	44	32	75
Total (housing with care)		42	120	446	326	99	425
Residential care bedspaces		37	389	397	8	88	96
Nursing care bedspaces		42	489	446	-43	99	56
Total bedspaces		79	878	843	-35	188	152

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.15 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Stratford-on-Avon

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	62	686	1,085	399	307	705
	Affordable	45	624	795	171	225	396
Total (housing with support)		107	1,310	1,880	570	532	1,101
Housing with care	Market	27	171	478	307	135	442
	Affordable	11	46	199	153	56	209
Total (housing with care)		39	217	677	460	191	651
Residential care bedspaces		34	521	602	81	170	251
Nursing care bedspaces		39	598	677	79	191	270
Total bedspaces		73	1,119	1,278	159	362	521

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.16 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Warwick

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	66	716	937	221	208	429
	Affordable	47	783	669	-114	149	35
Total (housing with support)		113	1,499	1,606	107	357	463
Housing with care	Market	29	407	410	3	91	94
	Affordable	12	169	168	-1	37	36
Total (housing with care)		41	576	578	2	128	130
Residential care bedspaces		36	497	514	17	114	131
Nursing care bedspaces		41	595	578	-17	128	111
Total bedspaces		77	1,092	1,092	0	243	242

Source: Derived from Demographic Projections and Housing LINEAC

14.36 It can be seen by 2032 there is an estimated need for 605 additional dwellings with support or care across the whole study area (per annum). In addition, there is a need for 224 additional nursing and residential care bedspaces. Typically for bedspaces it is conventional to convert to dwellings using a standard multiplier (1.80 bedspaces per dwelling for older persons accommodation) and this would therefore equate to around 125 dwellings. In total, the older persons analysis therefore points towards a need for around 730 units per annum over the 2022-32 period – this equates to around 19% of the housing need derived from the trend-based projection.

14.37 The table below summarises this information for local authorities. This shows some variation in need across areas, this is driven by both the demographic profile of each area and the current supply of specialist housing.

Table 14.17 Estimated proportion of need as older persons housing – linking to trend-based projections

	Housing with care/support	Bedspace allowance	Total need	Dwelling need	% as older persons
Coventry	219	37	257	1,409	18.2%
North Warwickshire	0	8	8	127	6.5%
Nuneaton & Bedworth	115	28	143	380	37.6%
Rugby	36	8	45	681	6.5%
Stratford-on-Avon	175	29	204	671	30.4%
Warwick	59	13	73	644	11.3%
Warwickshire	386	87	473	2,504	18.9%
Coventry-Warwickshire	605	125	730	3,913	18.6%

Source: Derived from a range of sources

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- 14.38 The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run. The availability of housing options which are accessible to older people will also provide the opportunity for older households to 'rightsize' which can help improve their quality of life.
- 14.39 It should also be noted that within any category of need there may be a range of products. For example, many recent market extra-care schemes have tended to be focused towards the 'top-end' of the market and may have significant service charges (due to the level and quality of facilities and services). Such homes may therefore only be affordable to a small proportion of the potential market, and it will be important for the Councils to seek a range of products that will be accessible to a wider number of households if needs are to be met.

Older Persons' Housing, Planning Use Classes and Affordable Housing Policies

- 14.40 The issue of use classes and affordable housing generally arises in respect of extra care/ assisted living development schemes. The Planning Practice Guidance defines extra care housing or housing with care as follows:

"This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses".

- 14.41 There is a degree to which different terms can be used for this type of development inter-changeably, with reference sometimes made to extra care, assisted living, continuing care retirement communities, or retirement villages. Accommodation units typically include sleeping and living accommodation, bathrooms and kitchens; and have their own front door. Properties having their own front doors is not however determinative of use.
- 14.42 The distinguishing features of housing with care is the provision of personal care through an agency registered with the Care Quality Commission, and the inclusion of extensive facilities and communal space within these forms of development, which distinguish them from blocks of retirement flats.

Use Classes

- 14.43 Use classes are defined in the Town and Country Planning (Use Classes) Order 1987. Use Class C2: Residential Institutions is defined as "use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses))." C3 (dwelling

houses) are defined as “use as a dwelling house (whether or not as a sole or main residence) a) by a single person or by people living together as a family; or b) by no more than 6 residents living together as a single household (including a household where care is provided for residents).”

14.44 Care is defined in the Use Class Order as meaning “personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care or children and medical care and treatment.”

14.45 Personal care has been defined in Regulations⁵⁵ as “the provision of personal care for persons who, by reasons of old age, illness or disability are unable to provide it for themselves, and which is provided in a place where those persons are living at the time the care is provided.”

14.46 Government has released new Planning Practice Guidance of *Housing for Older and Disabled People* in June 2019. In respect of Use Classes, Para 63-014 therein states that:

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

14.47 The relevant factors identified herein are the level of care which is provided, and the scale of communal facilities. It is notable that no reference is made to whether units of accommodation have separate front doors. This is consistent with the Use Class Order, where it is the ongoing provision of care which is the distinguishing feature within the C2 definition. In a C2 use, the provision of care is an essential and ongoing characteristic of the development and would normally be secured as such through the S106 Agreement.

14.48 A range of appeal decisions have addressed issues relating to how to define the use class of a development. These are fact specific, and there is a need to consider the particular nature of the scheme. What arises from this, is that schemes which have been accepted as a C2 use commonly demonstrate the following characteristics:

- Occupation restricted to people (at least one within a household) in need of personal care, with an obligation for such residents to subscribe to a minimum care package. Whilst there has been debate about the minimum level of care to which residents must sign-up to, it is considered that this should not be determinative given that a) residents’ care needs would typically change over time, and in most cases increase; and b) for those without a care need the relative costs associated with the care package would be off-putting.

⁵⁵ Schedule 1 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010.

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- Provision of access to a range of communal areas and facilities, typically beyond that of simply a communal lounge, with the access to these facilities typically reflected in the service charge.

NPPF Policies on Affordable Housing

- 14.49 For the purposes of developing planning policies in a new Local Plan, use class on its own need not be determinative on whether affordable housing provision could be applied. In all cases we are dealing with residential accommodation. But nor is there a clear policy basis for seeking affordable housing provision or contributions from a C2 use in the absence of a development plan policy which seeks to do so.
- 14.50 The NPPF (July 2021) sets out in paragraph 34 that Plans should set out the contributions expected from development, including levels of affordable housing. Such policies should not undermine the deliverability of the Plan. Paragraph 63 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless off-site provision or a financial contribution can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 14.51 Paragraph 64 states that affordable housing should not be sought from residential developments that are not major developments. Paragraph 65 sets out that specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students) are exempt from the requirement for 10% of homes (as part of the affordable housing contribution) to be for affordable home ownership. But neither of these paragraphs set out that certain types of specialist accommodation for older persons are exempt from affordable housing contributions.
- 14.52 The implication for Coventry-Warwickshire is that:
- The ability to seek affordable housing contributions from a C2 use at the current time is influenced by how its current development plan policies were constructed and evidenced; and
 - If policies in a new development plan are appropriately crafted and supported by the necessary evidence on need and viability, affordable housing contributions could be sought from a C2 use through policies in a new Local Plan.
- 14.53 Within the local plan, it would be possible to craft a policy in such a way that affordable housing could be sought on extra care housing from both C2 and C3 use classes and it should be noted that in July 2020 the High Court rejected claims that ‘extra care’ housing should not contribute affordable homes because it falls outside C3 use (CO/4682/2019). It is however important to recognise that the viability of extra care housing will differ from general mixed tenure development schemes, and there are practical issues associated with how mixed tenure schemes may operate.

Viability

14.54 There are a number of features of a typical extra care housing scheme which can result in substantively different viability characteristics relative to general housing. In particular:

- Schemes typically include a significant level of communal space and on-site facilities, such that the floorspace of individual units might equate to 65% of the total floorspace, compared to 100% for a scheme of houses and perhaps 85% for typical flatted development. There is a significant proportion of space from which value is not generated through sales (although individual units may be smaller);
- Higher construction and fit out-costs as schemes need to achieve higher accessibility requirements and often include lifts, specially adapted bathrooms, treatment rooms etc. In many instances, developers need to employ third party building contractors are also not able to secure the same economies of scale as the larger volume housebuilders;
- Sales rates are also typically slower for extra care schemes, not least as older residents are less likely to buy 'off plan.' The combination of this and the limited ability to phase flatted schemes to sales rates can result in higher finance costs for a development.

14.55 There are a number of implications arising from this. Firstly, there is a need for viability evidence to specifically test and consider what level of affordable housing could be applied to different forms of older persons accommodation, potentially making a distinction between general market housing; retirement living/sheltered housing; and extra care/housing with care. It may well be that a differential and lower affordable housing policy is justified for housing with care.

14.56 Secondly, developers of extra care schemes can struggle to secure land when competing against mainstream housebuilders or strategic land promoters. One way of dealing with this is to allocate sites specifically for specialist older persons housing, and this may be something that the Council wishes to consider through the preparation of a new Local Plan. There could be benefits of doing this through achieving relatively high-density development of land at accessible locations, and in doing so, releasing larger family housing elsewhere as residents move out.

Practical Issues

14.57 In considering policies for affordable housing provision on housing with care schemes, there is one further factor which warrants consideration relating to the practicalities of mixed-tenure schemes. The market for extra care development schemes is currently focused particularly on providers at the affordable and higher ends of the market, with limited providers currently delivering within the 'mid-market.' At the higher ends of the market, the level of facilities and services/support available can be significant, and the management model is often to recharge this through service charges.

14.58 Whilst recognising the benefits associated with mixed income/tenure development, in considering whether mixed tenure schemes can work it is important to consider the degree to which service charges will be affordable to those on lower incomes and whether Registered Providers will want or be able to support access to the range of services/facilities on site. In a range of instances, this has meant that authorities have accepted off-site contributions to affordable housing provision.

Wheelchair User Housing

14.59 Information about the need for housing for wheelchair users is difficult to obtain, particularly at a local level and estimates of need produced in this report draw on data from the English Housing Survey (EHS) which provides a range of relevant data, but often for different time periods. The EHS data used includes the age structure profile of wheelchair users, information about work needed to homes to make them 'visitable' for wheelchair users and data about wheelchair users by tenure.

14.60 The analysis below sets out estimates of the number of wheelchair users in each local authority; this has been based on estimating prevalence rates from the 2011-12 EHS (Annex Table 6.11) combined with Census data. At the time, the EHS showed there were 184,000 households with a wheelchair user and the oldest person in the household was aged under 60; the 2011 Census showed a households population of 40.6 million people aged under 60 and therefore a base prevalence rate of 0.005 has been calculated for this group – essentially for every 1,000 people aged under 60 there are around 5 wheelchair user households. The table below shows data for a full range of age groups; it should be noted that whilst the prevalence rates mix households and population they will provide a reasonable estimate of the number of wheelchair user households.

Table 14.18 Baseline prevalence rates by age used to estimate wheelchair user households – England

	Number of wheelchair user households	Household population	Prevalence (per 1,000 population)
under 60 years	184,000	40,562,000	5
60 - 74 years	205,000	7,668,000	27
75 - 84 years	191,000	2,832,000	68
85 years or over	146,000	997,000	146

Source: Derived from EHS (2011-12) and 2011 Census

14.61 The analysis also considers the relative health of the population of Coventry-Warwickshire. For this, data has been taken from the 2011 Census for the household population with 'day to day activities limited a lot' by their disability. The tables below show this information by age in the study area and England, and also shows the adjustment made to reflect differences in health between the areas. Due to the age bands used in the Census, there has been some degree of adjustment for the under 60 and 60-74 age groups. The data shows higher levels of disability for all age groups in Coventry,

pointing to a slightly higher than average proportion of wheelchair user households – the opposite is largely true for Warwickshire although there will be variations across local authorities in the County.

Table 14.19 Proportion of people with day to day activities limited a lot (by age) – 2011 – Coventry

	% of age group with day to day activities limited a lot		Coventry as % of England	Prevalence rate (per 1,000 population)
	Coventry	England		
under 60 years	4.6%	4.2%	110.2%	5
60-74 years	16.8%	13.9%	120.8%	32
75-84 years	31.9%	29.1%	109.5%	74
85 years or over	57.1%	52.3%	109.1%	159

Source: 2011 Census

Table 14.20 Proportion of people with day to day activities limited a lot (by age) – 2011 – Warwickshire

	% of age group with day to day activities limited a lot		Warwickshire as % of England	Prevalence rate (per 1,000 population)
	Warwickshire	England		
under 60 years	3.5%	4.2%	83.7%	4
60-74 years	11.6%	13.9%	83.6%	22
75-84 years	27.4%	29.1%	94.1%	64
85 years or over	52.3%	52.3%	99.9%	146

Source: 2011 Census

- 14.62 The local prevalence rate data can be brought together with information about the population age structure and how this is likely to change moving forward. For Coventry, the data estimates a total of 4,987 wheelchair user households in 2022, and that this will rise to 5,541 by 2032 (an increase of 554). For Warwickshire, the current number of wheelchair users is put at 8,755 in 2022, increasing to 10,437 by 2032.

Table 14.21 Estimated number of wheelchair user households (2022-32) – Coventry

	Prevalence rate (per 1,000 population)	Household population 2022	Household population 2032	Wheelchair user households (2022)	Wheelchair user households (2032)
under 60 years	5	272,686	287,176	1,362	1,435
60 - 74 years	32	42,956	50,817	1,386	1,639
75 - 84 years	74	16,985	19,038	1,257	1,408
85 years or over	159	6,158	6,641	982	1,059
Total		338,784	363,672	4,987	5,541

Source: Derived from a range of sources

Table 14.22 Estimated number of wheelchair user households (2022-32) – Warwickshire

	Prevalence rate (per 1,000 population)	Household population 2022	Household population 2032	Wheelchair user households (2022)	Wheelchair user households (2032)
under 60 years	4	435,057	441,126	1,651	1,674
60 - 74 years	22	100,597	115,742	2,245	2,583
75 - 84 years	64	43,425	51,089	2,759	3,246
85 years or over	146	14,373	20,082	2,100	2,935
Total		593,452	628,039	8,755	10,437

Source: Derived from a range of sources

- 14.63 The finding of an estimated current number of wheelchair user households does not indicate how many homes might be needed for this group – some households will be living in a home that is suitable for wheelchair use, whilst others may need improvements to accommodation, or a move to an alternative home. Data from the EHS (2014-15) shows that of the 814,000 wheelchair user households, some 200,000 live in a home that would either be problematic or not feasible to make fully ‘visitable’ – this is around 25% of wheelchair user households. Applying this to the current number of wheelchair user households and adding the additional number projected forward suggests a need for 178 additional wheelchair user homes per annum in the 2022-32 period in Coventry and 380 in Warwickshire – this equates to 14% of all housing need (as set out in the table below).

Table 14.23 Estimated need for wheelchair user homes, 2022-32 (figure per annum)

	Current need	Projected need (2022-32)	Total current and future need	Trend-based housing need (2022-32)	% of Housing Need
Coventry	123	55	178	1,409	12.6%
North Warwickshire	30	16	46	127	36.2%
Nuneaton & Bedworth	58	35	93	380	24.5%
Rugby	36	32	68	681	10.0%
Stratford-on-Avon	47	50	97	671	14.5%
Warwick	44	31	75	644	11.7%
Warwickshire	215	165	380	2,504	15.2%
Coventry-Warwickshire	337	221	558	3,913	14.3%

Source: Derived from a range of sources

- 14.64 Furthermore, information in the EHS (for 2017/18) also provides national data about wheelchair users by tenure. This showed that, at that time, around 7.1% of social tenants were wheelchair users, compared with 2.7% of market households (owner-occupiers and private renters). Applying these national figures to the demographic change and need (as shown above) it is possible to estimate the potential need by tenure, as shown in the table below. This shows a need for around 12% of market homes to be M4(3) along with 31% of affordable.

Table 14.24 Estimated need for wheelchair user homes by tenure, 2022-32

	Market	Affordable
Coventry	10%	26%
North Warwickshire	28%	74%
Nuneaton & Bedworth	19%	50%
Rugby	8%	21%
Stratford-on-Avon	11%	30%
Warwick	9%	24%
Warwickshire	12%	31%
Coventry-Warwickshire	12%	31%

Source: Derived from demographic projections and EHS prevalence rates

- 14.65 To meet the identified need, the Councils could seek a proportion (around 10-15%) of all new market homes to be M4(3) compliant and potentially around a third in the affordable sector. These figures reflect that not all sites would be able to deliver homes of this type. In the market sector these homes would be M4(3)A (adaptable) and M4(3)B (accessible) for affordable housing.
- 14.66 As with M4(2) homes it may not be possible for some schemes to be built to these higher standards due to built-form, topography, flooding etc. Furthermore, provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build out costs (see table below).
- 14.67 It is worth noting that the Government has recently published findings from a consultation on changes to the way the needs of people with disabilities and wheelchair users are planned for. This is as a result of concerns that in the drive to achieve housing numbers, the delivery of housing that suits the needs of the households (in particular those with disabilities) is being compromised on viability grounds⁵⁶.
- 14.68 A key outcome of this consultation is the proposal to change building regulations so that M4(1) is removed altogether, so that all new homes will have to at least have the accessible and adaptable features of an M4(2) home. M4(3) would apply where there is a local planning policy in place in which a need has been identified and evidenced. This is consistent with the evidence presented in this report, although the trade-off identified in the consultation paper between viability and the need to deliver sufficient numbers of market homes to meet general housing needs is unavoidable.
- 14.69 The viability challenge is particularly relevant for M4(3)(B) standards. These make properties accessible from the moment they are built and involve high additional costs that could in some cases challenge the feasibility of delivering all or any of a policy target.

⁵⁶ Raising accessibility standards for new homes, a consultation paper, page 10

Table 14.25 Access Cost Summary

	1-Bed Apartment	2-Bed Apartment	2-Bed Terrace	3-Bed Semi Detached	4-Bed Semi- Detached
M4(2)	£940	£907	£523	£521	£520
M4(3)(A) – Adaptable	£7,607	£7,891	£9,754	£10,307	£10,568
M4(3)(B) – Accessible	£7,764	£8,048	£22,238	£22,791	£23,052

Source: EC Harris, 2014

- 14.70 However, local authorities only have the right to request M4(3)(B) accessible compliance from homes for which they have nomination rights. They can, however, request M4(3)(A) adaptable compliance from the wider (market) housing stock.
- 14.71 A further option for the Councils would be to consider seeking a higher contribution, where it is viable to do so, from those homes to which they have nomination rights. This would address any under delivery from other schemes (including schemes due to their size e.g. less than 10 units or 1,000 square metres) but also recognise the fact that there is a higher prevalence for wheelchair use within social rent tenures. This should be considered when setting policy.

Summary

- 14.72 A range of data sources and statistics have been accessed to consider the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. The analysis responds to Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019 and includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).
- 14.73 The data shows in general that Warwickshire has a slightly older age structure and similar levels of disability compared with the national average whilst Coventry has a younger age structure (and higher age-specific rates of disability in a regional/national context). The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:
- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth);
 - A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;

-
- A need for around 1,960 housing units with support (sheltered/retirement housing) in Coventry and 1,840 units in Warwickshire – mainly affordable housing in Coventry and market homes in Warwickshire;
 - A need for around 230 additional housing units with care (e.g. extra-care) in Coventry and over 2,000 in Warwickshire – focussed on market housing in both areas;
 - A need for additional nursing care bedspaces and some residential care in Warwickshire; and
 - a need for around 180 (Coventry) and 400 (Warwickshire) dwellings per annum to be for wheelchair users (meeting technical standard M4(3)).

14.74 This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Given the evidence, the Councils could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and 10%+ of homes meeting M4(3) – wheelchair user dwellings (a higher proportion in the affordable sector).

14.75 Where the authority has nomination rights M4(3) would be wheelchair accessible dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user). It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

14.76 The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

14.77 In seeking M4(2) compliant homes, the Council should also be mindful that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

14.78 In framing policies for the provision of specialist older persons accommodation, the Councils will need to consider a range of issues. This will include the different use classes of accommodation (i.e. C2 vs. C3) and requirements for affordable housing contributions (linked to this the viability of provision). There may also be some practical issues to consider, such as the ability of any individual development being mixed tenure given the way care and support services are paid for.

15. CONCLUSIONS

- 15.1 This section sets out a summary of the analysis and conclusions for the authorities to take forward in the development of local plans across the sub-region.

Local Housing Need

- 15.2 The starting point for assessing housing need is the standard method set out in Planning Practice Guidance. This identifies a need for 5,554 dwellings annually across Coventry and Warwickshire, with a particular concentration of need in Coventry influenced by the two-stage affordability uplift which is applied to a high demographic projection.
- 15.3 However previous evidence has identified, and is has now been recognised by the Statistics Regulator and accepted by the Office for National Statistics (ONS), that there have been issues with estimating and projecting the population in Coventry. Initial Census data released in June 2022 supports this. The HEDNA has therefore modelled new demographic projections which take account of the initial Census data releases, and seek to assess how the population can be expected to change over time. The HEDNA then applies these alternative projections through the framework provided by the standard method.
- 15.4 The results of the housing needs modelling undertaken are shown below. The new trend-based projections point to a need for 4,906 dwellings annually across the sub-region. This is lower than the Standard Method (using 2014-based Household Projections), which shows a need for 5,554 dpa across the Coventry and Warwickshire HMA, due to the clear issues with population data feeding into projections for Coventry.

Table 15.1 Overall Housing Need

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	HMA
2014-based	3,188	176	435	516	564	675	5,554
Trend-based	1,964	119	409	735	868	811	4,906

- 15.5 Given across the HMA that population figures have been over-estimated for many years, it is reasonable and expected that any alternative trend-based projection would show a lower need. It is however recommended that the Councils monitor new data releases from ONS (including MYE and projections) as ONS will need to grapple with the issue of inaccuracies in the MYE in any future releases.

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- 15.6 Econometric forecasts do not point to as strong growth moving forwards as we have seen in recent years (with the economic forecasts showing additional job creation of c. 3,300 which falls below labour supply growth in the trend-based projections). Demographic growth (in the revised projections) therefore supports sufficient growth in labour supply across Coventry and Warwickshire as a whole; and there is therefore no case for adjusting upwards overall housing need.
- 15.7 However for North Warwickshire, there is a potential case for higher housing provision than the overall housing need figures shown in Table 15.1 to manage cross-boundary commuting. This can be achieved through questions of the distribution of housing provision; and North Warwickshire's existing Plan makes provision for meeting unmet needs from other areas (Coventry and Birmingham) which contribute to labour force growth and thus achieve this.
- 15.8 Both Stratford-on-Avon and North Warwickshire sit across the Coventry & Warwickshire and Greater Birmingham Housing Market Areas. These authorities will therefore need to consider unmet needs from Birmingham in setting housing targets within their respective local plans alongside any unmet needs from within the Coventry & Warwickshire HMA.
- 15.9 In setting housing targets in individual local plans, the affordable housing evidence is also relevant. In the northern part of the sub-region in particular – in North Warwickshire and Nuneaton and Bedworth - this supports the case for considering, as part of the plan-making process, higher housing provision than shown in Table 15.5 in order to boost the delivery of affordable housing.

Employment Land Requirements

- 15.10 Coventry and Warwickshire is a £26 billion economy, accounting for 19% of West Midlands GVA. Growth in GVA has slightly out-performed regional and national trends. Total employment in 2019 across Coventry and Warwickshire is estimated at 526,900 jobs. The economic participation rate in the sub-region (79.3%) is marginally above the national rate (78.8%) but considerably stronger than the region (77.5%).
- 15.11 Manufacturing is the largest sector in employment terms, accommodating 58,000 jobs. The next largest sectors are education and professional services. The analysis points to some higher value manufacturing activities, such as machinery, in which there is a reasonable representation. Brexit is creating uncertainties; as well as warehousing/logistics, where demand is currently strong influenced by growth in e-retailing; and education.
- 15.12 The office market has been weakened. Covid-driven shift towards homeworking and associated uptake of virtual communication technologies is likely to have some impact on future requirements with a range of companies likely to support at least part-time working from home. Whilst this may be in part offset by changing use of office space and associated layouts, it is likely to have some

downward impact on future office floorspace needs. It can also be expected to drive a flight towards good quality space.

- 15.13 The sub-region, and in particular the northern and central parts of it, clearly has a strong and dynamic and industrial market. The evidence points to a very significant stock of industrial floorspace at almost 8 million sq. m of space and sustained high take-up over the period since 2013. Whilst there are some challenges for the automotive sector, which can be relatively cyclical and has influenced strong take-up in recent years, demand for logistics/distribution space looks likely to remain strong buoyed by the growth in e-retailing in particular. Rents and land values are reaching record levels.
- 15.14 Available industrial space remains low and the strength of demand has support strong recent development activity together with growth in rents, with a very substantial 1.3 million sq. m of space delivered since 2013 with over 1 million sq. m over the 2015-20 period. New supply does appear to be coming forwards, not least as sites allocated in the last round of local plans start to progress, but there will likely be a continuing need to replenish industrial supply over time if economic growth is not to be constrained.
- 15.15 The HEDNA has considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. In doing so, it has modelled employment land needs utilising a range of different forecasting techniques alongside local intelligence and an understanding of the merits of different approaches in drawing conclusions. This approach of triangulating different approaches and testing findings, which Iceni adopts, is consistent with the PPG.
- 15.16 In the context of the need for office space, the HEDNA concludes that given that office requirements tend to be closely linked to employment levels, it is recommended that in the round the labour demand models best represent future needs for office floorspace. The labour demand should best represent the future economic outlook, it is recommended that this be used for planning policy requirements.
- 15.17 In respect of industrial and warehousing, the HEDNA concludes that neither the VOA or labour demand models are able to differentiate the strategic and more local industrial / warehouse requirements. As a result, the completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace particularly for the short/medium-term. Comparing the completions data with other sources, monitoring by authorities suggests far higher levels of development have been achieved and therefore may be required in the future.
- 15.18 In respect of strategic warehousing floorspace (units over 9,000 sq.m), the HEDNA concludes that it would be appropriate to plan for future development to be in line with recent completions trends over the initial 10 year period (2021-31), with the subsequent decade then seeing potentially slower

growth in line with the traffic growth and replacement demand modelling. On this basis, the HEDNA concludes on a need for 606 ha of land to 2041, and 709 ha to 2050.

15.19 Icen's consultation exercise suggests that whilst B8 demand is very strong, there is a need for separate allocations for E(g)(iii)/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.

15.20 Drawing the above together and factoring in an adjustment for a margin to incorporate flexibility, the HEDNA concludes on the employment land needs set out in the tables below.

Table 15.2 Employment Land Needs 2021-2041, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.7	621.9	659.6	606

Source: VOA / CE/Iceni

Table 15.3 Employment Land Needs 2021-2050, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	49.4	901.8	951.2	709

Source: VOA / CE/Iceni

Affordable Housing

15.21 The HEDNA models the need for affordable housing using the approach set out by Government in Planning Practice Guidance (PPG). It identifies a net need for 3,833 social or affordable rented

homes per annum across the sub-region from households who cannot afford to meet their needs within the open market.

- 15.22 The evidence indicates that around 20-30% of the rented need identified should theoretically be met through provision of affordable rented homes; but there are wider considerations to be taken into account in determining policies for new-build development, including individual council's priorities, what rents are charged for existing stock and viability considerations.

Table 15.4 Annual Need for Social / Affordable Rented Housing

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	495	1,667	653	2,816	929	1,887
North Warwickshire	40	163	52	256	124	131
Nuneaton & Bedworth	102	431	188	720	313	407
Rugby	77	398	166	640	233	407
Stratford-on-Avon	81	397	238	716	297	419
Warwick	132	571	204	907	325	582
Warwickshire	431	1,959	848	3,238	1,292	1,946
C & W	926	3,627	1,501	6,054	2,221	3,833

- 15.23 In addition the core analysis within the report indicates that there is a need for around 609 affordable home ownership homes per annum. The figures for individual authorities are set out in the table below. The greatest need shown is in South Warwickshire, with the evidence pointing to a lack of or very modest need for affordable home ownership products in North Warwickshire and Nuneaton and Bedworth. This assumes some contribution to supply from sales of market homes below lower quartile prices.

Table 15.5 Estimated Need for Affordable Home Ownership by sub-area (per annum)

	Total Gross Need	Supply	Net need
Coventry	633	484	149
North Warwickshire	120	118	2
Nuneaton & Bedworth	214	230	-16
Rugby	296	208	88
Stratford-on-Avon	410	281	129
Warwick	553	296	258
Warwickshire	1,593	1,133	460
Coventry-Warwickshire	2,226	1,617	609

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- 15.24 The affordable housing need is high relative to the overall housing need. However the two are not directly comparable, as the assessment of overall housing need looks at the overall need for additional homes; whereas the affordable housing need in part reflects an existing tenure imbalance. Future affordable housing delivery will be influenced by issues related to viability and the availability of funding. Policies for affordable housing provision within local plans should therefore be influenced by a combination of the needs evidence, viability evidence which examines what affordable housing can be viable delivered through mixed tenure schemes, together with Council priorities. The affordable need, in particular for social/ affordable rented homes, is a consideration in setting overall housing targets, but it should be recognised that viability and the availability of funding are realistically constraints on the level of provision which can be achieved.
- 15.25 The evidence indicates that around 20-30% of the rented need identified should theoretically be met through provision of social rented homes; but there are wider considerations to be taken into account in determining policies for new-build development, including individual council's priorities, what rents are charged for existing stock and viability considerations.
- 15.26 Both First Homes and Shared Ownership will have a role to play in helping households with marginal affordability. Shared ownership is likely to be suitable for households with more marginal affordability (those only just able to afford to privately rent) as it has the advantage of a lower deposit and subsidised rent than for First Homes and its delivery should therefore be encouraged. The HEDNA indicates that First Homes should be priced at least the minimum discount of 30% of the Open Market Value (OMV). Shared ownership properties will also have a role in meeting needs and are suitable in particular for households with more marginal affordability and lower savings.
- 15.27 Targets for affordable housing provision within local plans should be influenced by a combination of the needs evidence, viability evidence which examines what affordable housing can be viable delivered through mixed tenure schemes, together with Council priorities.

Sizes & Types of Homes Needed

- 15.28 The HEDNA models the implications of demographic dynamics on the need for different sizes of property by tenure, taking account of how households occupy homes with adjustments to address overcrowding and provide opportunities for rightsizing.
- 15.29 The analysis indicates that the need for social or affordable rented properties should be focused on smaller properties, as in this sector households size is more closely aligned to the sizes of homes. 70% of the need identified is for 1- and 2-bed properties; and 30% for properties with three or more bedrooms. The profile by individual local authority is shown below.

Table 15.6 Suggested Mix of Social/Affordable Rented Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	30%	35%	25%	10%
North Warwickshire	30%	35%	25%	10%
Nuneaton & Bedworth	25%	35%	30%	10%
Rugby	35%	30%	20%	15%
Stratford-on-Avon	40%	35%	20%	5%
Warwick	40%	35%	20%	5%
Warwickshire	35%	35%	20%	10%
Coventry-Warwickshire	35%	35%	20%	10%

- 15.30 Affordable home ownership homes should be focused on delivery of 2- and 3-bedroom properties, with the evidence pointing to a greater need for 2-bed homes than other property sizes.

Table 15.7 Suggested Mix of Affordable Home Ownership Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	20%	45%	25%	10%
North Warwickshire	20%	40%	30%	10%
Nuneaton & Bedworth	20%	40%	30%	10%
Rugby	20%	40%	30%	10%
Stratford-on-Avon	20%	45%	25%	10%
Warwick	20%	45%	25%	10%
Warwickshire	20%	40%	30%	10%
Coventry-Warwickshire	20%	45%	25%	10%

- 15.31 The mix of market homes needed is focused towards 2- and 3-bed properties, as shown below. This takes account of the ageing of the population and role which suitable housing provision can have in enabling rightsizing. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay.

Table 15.8 Suggested Mix of Market Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	10%	40%	40%	10%
North Warwickshire	10%	35%	45%	10%
Nuneaton & Bedworth	10%	35%	45%	10%
Rugby	10%	30%	45%	15%
Stratford-on-Avon	10%	35%	40%	15%
Warwick	10%	40%	40%	10%
Warwickshire	10%	35%	45%	10%
Coventry-Warwickshire	10%	40%	40%	10%

15.32 These figures are intended to be used as a monitoring tool rather than to be applied rigidly to all individual development sites. In applying the evidence, consideration should be given to the existing house mix in the locality and gaps within this; site location and characteristics; and local needs or market evidence (including from Council's housing registers). Additionally, the Councils should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market. Provision of specialist housing can assist in releasing existing family homes and supporting turnover in the wider housing market.

Housing a growing Older Population

15.33 The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run. The availability of housing options which are accessible to older people will also provide the opportunity for older households to 'rightsize' which can help improve their quality of life.

15.34 The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:

- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth);
- A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;

- A need for around 1,960 housing units with support (sheltered/retirement housing) in Coventry and 1,840 units in Warwickshire – mainly affordable housing in Coventry and market homes in Warwickshire;
- A need for around 230 additional housing units with care (e.g. extra-care) in Coventry and over 2,000 in Warwickshire – focussed on market housing in both areas;
- A need for additional nursing care bedspaces and some residential care in Warwickshire; and
- a need for around 180 (Coventry) and 400 (Warwickshire) dwellings per annum to be for wheelchair users (meeting technical standard M4(3)).

15.35 On the basis of the evidence, the Council should consider requiring all dwellings (in all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and 10%+ of homes meeting M4(3) – wheelchair user dwellings (a higher proportion in the affordable sector). The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

15.36 The analysis suggests that there will be a notable need for both housing with support and housing with care (in both market and affordable sectors), as well as some additional nursing and residential care bedspaces. In Coventry the need is particularly for affordable housing (housing with support), with the opposite being the case in Warwickshire.

Table 15.9 Specialist Housing Need 2022-32 – Coventry

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	40	462	970	508	104	612
	Affordable	93	1,168	2,274	1,106	245	1,350
Total (housing with support)		133	1,630	3,244	1,614	349	1,963
Housing with care	Market	21	210	514	304	55	360
	Affordable	27	855	653	-202	70	-131
Total (housing with care)		48	1,065	1,168	103	126	228
Residential care bedspaces		42	1,203	1,038	-165	112	-53
Nursing care bedspaces		48	567	1,168	601	126	726
Total bedspaces		90	1,770	2,206	436	238	673

Source: Derived from Demographic Projections and Housing LINEAC

Table 15.10 Specialist Housing Need 2022-32 – Warwickshire

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	58	1,913	3,560	1,647	843	2,490
	Affordable	60	5,198	3,695	-1,503	848	-655
Total (housing with support)		118	7,111	7,255	144	1,691	1,836
Housing with care	Market	27	721	1,665	944	392	1,336
	Affordable	15	477	947	470	217	687
Total (housing with care)		43	1,198	2,612	1,414	609	2,023
Residential care bedspaces		38	2,253	2,322	69	541	610
Nursing care bedspaces		43	2,261	2,612	351	609	960
Total bedspaces		80	4,514	4,934	420	1,150	1,570

Source: Derived from Demographic Projections and Housing LIN/EAC

Self and Custom Housebuilding

- 15.37 Self-build and custom housebuilding is a growing sector of the housing market, and one which has potential to contribute to housing delivery. All of the local authorities in the study area introduced a Self-Build and Custom Housebuilding Register on 1st April 2016 in line with the requirements of legislation.
- 15.38 If assessed over the five base periods to date, there has been an average of 155 registered expressions of interest in a serviced plot of land and a total of 774 entries. Despite the introduction of a local connection test and fee, Warwick remains the most popular local authority for this type of development.
- 15.39 Each of the local authorities have a local plan policy (or draft policy) supporting Self and Custom Build development. In addition to a specific policy, Rugby, Stratford-on-Avon and Warwick have also produced an SPG. Icenis consider that in order to respond to demand in the sector, and in response to the PPG's requirements, the Councils - particularly those in South Warwickshire where demand is greatest - should continue to express active support self and custom build homes, but should also consider seeking a percentage of self and custom build on larger sites with an appropriate fallback mechanism should plots fail to sell; consider opportunities to identify specific sites for serviced plots (i.e. on public sector land, where available) and encourage developers as part of the overall housing mix to incorporate serviced plots where there is evidence of strong demand.

Private Rented Sector and Build to Rent

- 15.40 The private rented sector has been the key growth sector in the housing market for the last 15 years and now makes up just over 20% of all UK households. Across the study area, the growth in the private rented sector was strong over the last two census points outperforming the national trend

between 2001-11. There are different components to the sector, including a student market in Coventry and Warwick District. Across the board, the private rented sector supported around 37% of all Universal Credit claimants with a high of 41% in Coventry City and a low of 25% in Warwick District.

- 15.41 Over recent years, successive Governments have looked to the private rented sector to play a greater role in providing more new build housing and have sought to encourage “Build to Rent” development. BTR development has been delivered in Coventry and Stratford-upon-Avon, with development also now coming forward in Rugby. The HEDNA identifies the potential for BTR development in these authorities and in Warwick; both within town centre locations and potential through suburban build-to-rent development over time. The HEDNA also provides guidance on how the potential for Co-living can be considered and monitored.
- 15.42 In line with national policy, affordable housing in Build-to-Rent development should be provided as affordable private rented housing, with the PPG setting out that 20% should be sought at a 20% discount to market rents, subject to viability.

Student Housing Needs

- 15.43 The area has two universities: Coventry University and Warwick University. Student numbers have grown at both Universities since 2001, however, Coventry has seen more substantial growth and is defined as the fastest growing University in the UK. Coventry City and Warwick District have very different dynamics, with the majority of households residing in all student households – which principally comprise HMOs - and student halls. In all other authority areas, the majority of students live at home with parents.
- 15.44 Iceni has engaged with both Universities to understand growth ambitions and the latest position with student accommodation provision. Coventry University have indicated that student numbers are expected to remain static for the next 2-3 years. However the University has plans to continue to grow the international student population moving forward which could have an impact on housing needs in the medium to long-term. This should be closely monitored.
- 15.45 At Warwick University, there are around 29,550 students studying on-campus of which c. 7,500 students are housed on-campus. The University is currently in the midst of developing its Strategy looking ahead to 2030, which Iceni understand intends to increase numbers at a “sustainable moderate growth rate.” The approach to housing all first year UG students will be maintained and there is a desire to also offer some additional accommodation to returning students.
- 15.46 There is a sizeable pipeline of student accommodation provision in Coventry, with around 9,275 bedspaces in the pipeline. If delivered, this provides the potential to reduce the number of students

living in the wider housing market. As longer-term growth proposals become more clear, it will be important for the planning authorities to maintain dialogue with the two universities to appropriately manage delivery of student accommodation and ensure it keeps pace with or exceeds student growth.

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Sustainability Appraisal of the South Warwickshire Local Plan

Regulation 18: Issues and Options Stage

Volume 1 of 3: Non-Technical Summary

November 2022



Sustainability Appraisal of the South Warwickshire Local Plan

Regulation 18: Issues and Options Stage

Volume 1 of 3: Non-Technical Summary

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Non-Technical Summary

Introduction

- N1. Lepus Consulting is conducting a Sustainability Appraisal process for the South Warwickshire Local Plan (SWLP) Authorities of Stratford-on-Avon District Council and Warwick District Council to help them prepare the SWLP. The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages of the plan making process to facilitate iteration between the Plan makers (the SWLP Authorities) and the appraisal team (Lepus Consulting).
- N2. The SWLP is being prepared to determine the development needs within the districts for housing and jobs up to 2050 and to develop the planning policies that will be used to consider applications for development.
- N3. The primary role of the Local Plan is to promote a sustainable pattern of development that seeks to meet the needs of South Warwickshire, align growth and infrastructure, improve the environment, mitigate climate change and adapt to its effects.
- N4. SA is the process of informing and influencing the preparation of a development plan to optimise its sustainable development performance as the plan is prepared over several distinct stages including examination in public, and finally, adoption.
- N5. This document comprises a Non-Technical Summary (NTS) of the SA for the SWLP Issues and Options, which presents an assessment of the likely sustainability performance of the options presented in the SWLP Issues and Options document.
- N6. The preparation of the SWLP will be undertaken in a number of stages. The first stage of Local Plan preparation was called 'Scoping and Call for Sites' and was issued for public consultation in 2021. The current stage is called 'Issues and Options' which will be used to inform the next stage of Local Plan preparation.

What is Sustainability Appraisal?

- N7. Sustainability can be defined as "*meeting the needs of the present generation without compromising the ability of future generations to meet their own needs*"¹. To be sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1**).
- N8. SA is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

¹ Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: <http://www.un-documents.net/our-common-future.pdf> [Date Accessed: 14/04/22]

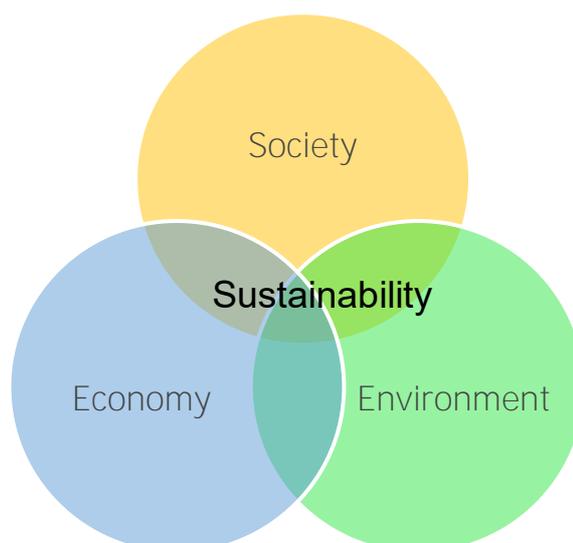


Figure N. 1: Sustainable development

- N9. The Planning and Compulsory Purchase Act² requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations³ (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including local plans, to ensure that environmental issues are fully integrated and addressed during decision-making.

Best Practice Guidance

- N10. Government policy recommends that both SA and SEA are undertaken under a single process, which incorporates the requirements of the SEA Directive. This is to be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:
- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment
 - Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive
 - Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans
 - Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF) Paragraph 32
 - Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)
- N11. SA is an iterative process which should be undertaken alongside development of the SWLP to maximise its sustainability performance as summarised in **Figure N.2**.

² Planning and Compulsory Purchase Act 2004. Available at:
<https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 14/04/22]

³ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at:
<http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 14/04/22]

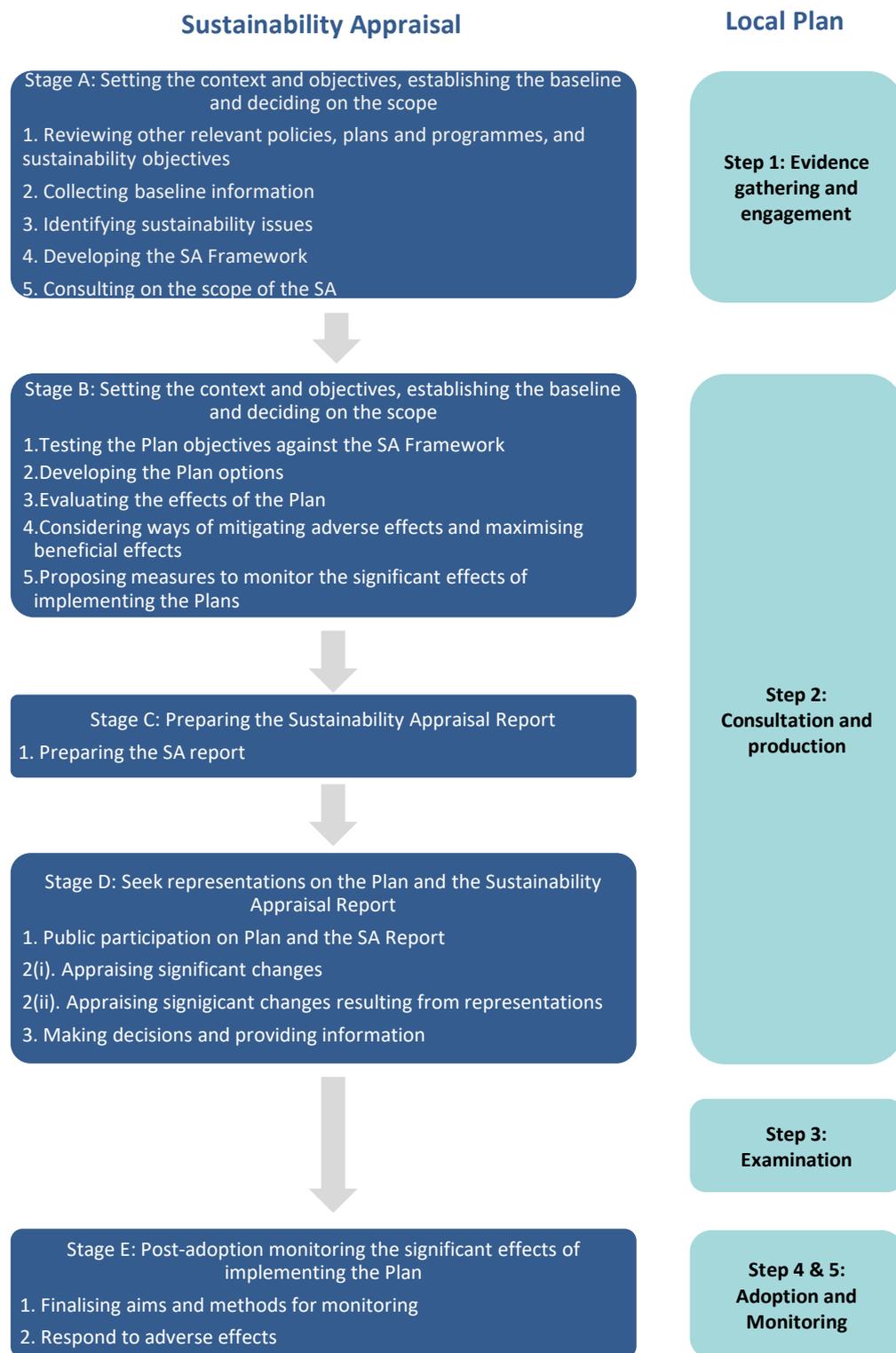


Figure N.2: Sustainability Appraisal process

South Warwickshire

- N12. Stratford-on-Avon District and Warwick District Councils together comprise roughly 126,390ha, with a combined population of approximately 283,200 people according to the Office for National Statistics (ONS) Census data for 2021⁴.
- N13. Stratford-on-Avon District and Warwick District lie within the south of Warwickshire County. As illustrated in **Figure N.3**, the majority of Stratford-on-Avon District is largely rural in nature. In contrast, Warwick District covers a smaller geographic area and is more densely populated.
- N14. The town of Royal Leamington Spa is the most populous town in the Plan area with a population of roughly 52,000. The town is characterised by its regency architecture. Royal Leamington Spa is adjoined with the town of Warwick in the west, Whitnash town in the south and is adjacent to Cubbington village. The River Leam runs through Royal Leamington Spa.
- N15. The town of Stratford-upon-Avon has a population of approximately 29,984. Stratford-upon-Avon is a medieval market town situated on the River Avon. The town has strong associations with its heritage interests and numerous Grade I, Grade II* and Grade II listed buildings are situated within it.

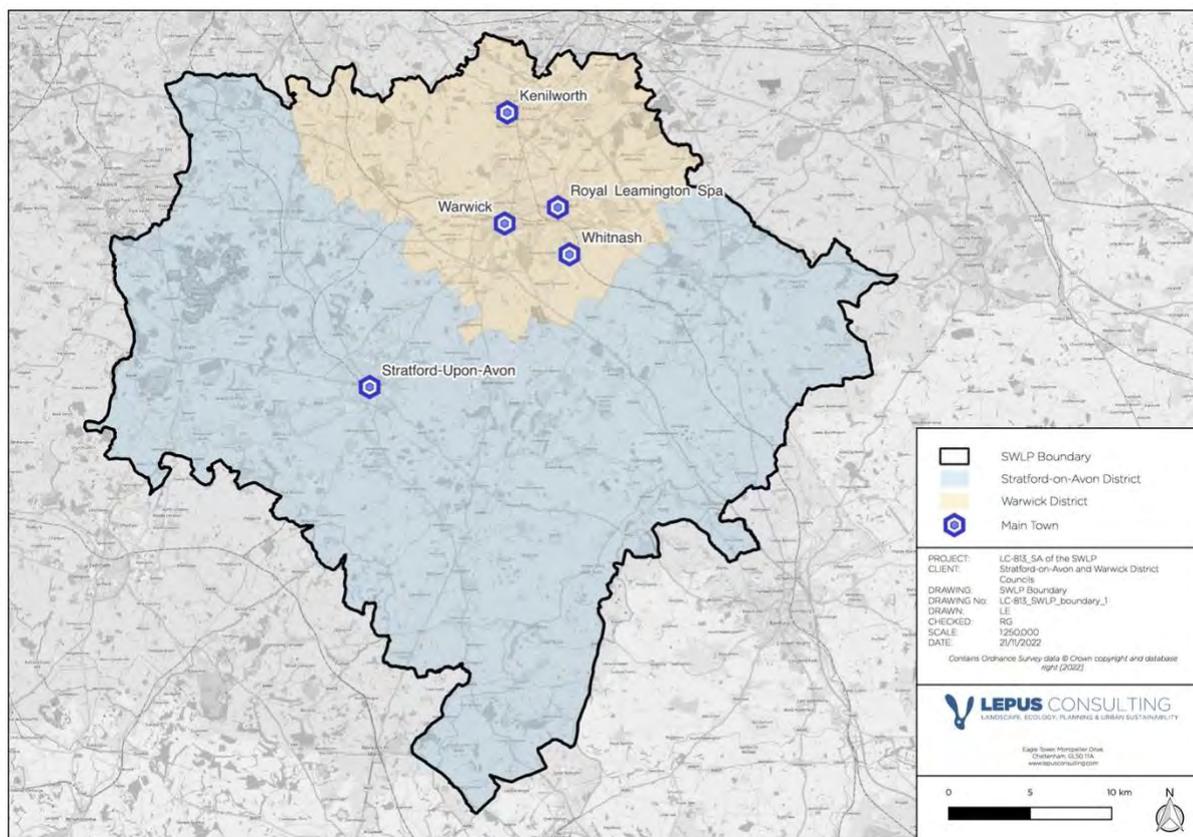


Figure N. 3: Map of the South Warwickshire Plan Area

⁴ Office for National Statistics (2022) Population and household estimates, England and Wales: Census 2021. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> [Date accessed: 01/11/22]

- N16. Together the two authorities contain important biodiversity sites, high quality landscape, and a wealth of historic assets. Notable features include the Cotswolds AONB which covers a small proportion of Stratford-on-Avon district in the south, Warwick Castle which is a Grade I listed building, as well as Registered Park and Gardens and a significant amount of Greenbelt land which covers the northern area of both districts.
- N17. In general, the SWLP area has good connections through national and regional transport infrastructure, although there are some issues with rural accessibility. The area provides approximately 159,200 jobs.

The SA Process So Far

- N18. **Figure N.4** illustrates the different stages of SA and outputs that are planned as part of the SA of the Local Plan up to the 'Publication Stage' which is presently scheduled for 2024. The process is currently at the second stage, called Issues and Options.

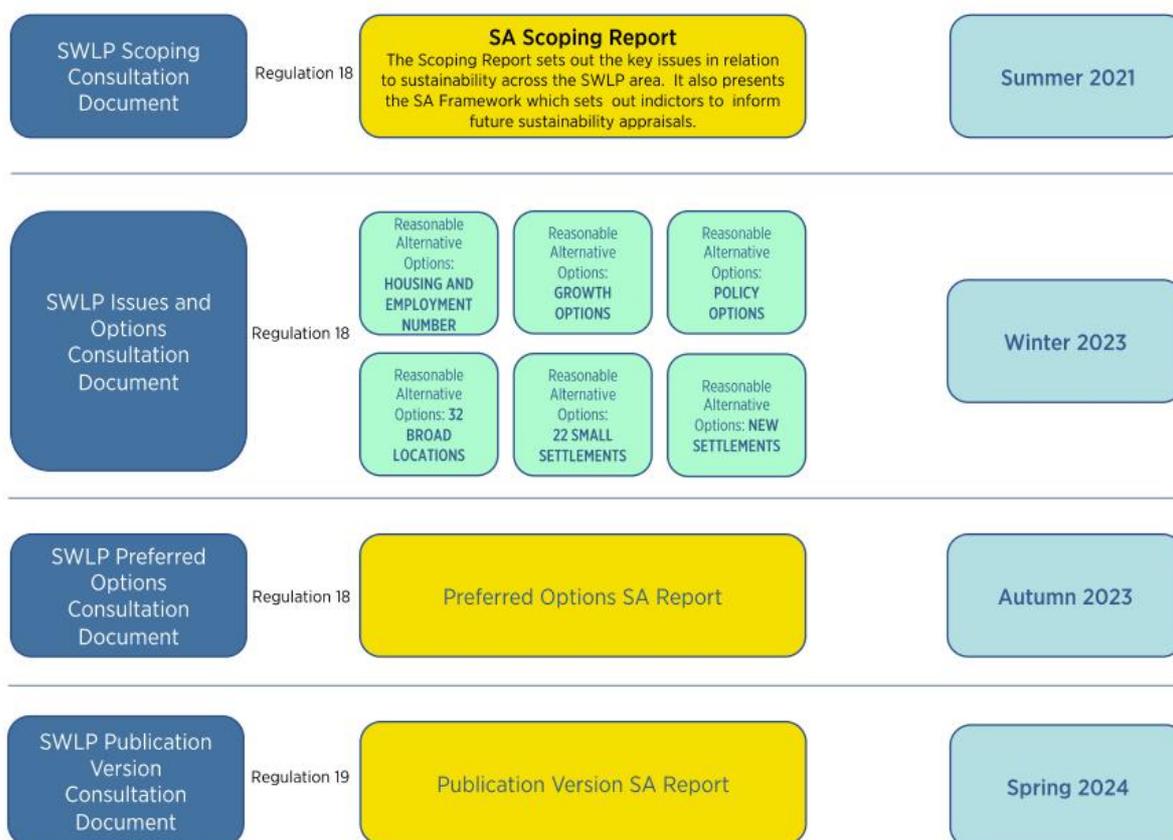


Figure N.4: The SA process so far

SA Scoping Report

- N19. The first stage of the process, scoping, was completed in June 2022. The SA Scoping Report specifies the scope and level of detail of information to be included in the SA process. The SA Scoping Report represented Stage A of the SA process (see **Figure N.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;

- Collecting baseline information;
- Identifying sustainability problems and key issues;
- The SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

N20. The Scoping Report was consulted on with the statutory bodies: Natural England, Historic England and the Environment Agency.

Sustainability Appraisal Framework

N21. As part of the SA scoping work, key sustainability issues are identified, and a SA Framework established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared. SA Objectives and indicators can be revised as further baseline information is collected and sustainability issues and challenges are identified.

N22. The SA Framework is provided in **Appendix A** of the main SA Report. A summary of the 13 SA Objectives is shown in **Figure N.5**. It should be noted that the order of SA Objectives does not infer any prioritisation.

N23. Each section of the Issues and Options document has been subject to SA. Using the SA Framework and expert judgement, the likely sustainability impacts of the document have been assessed.

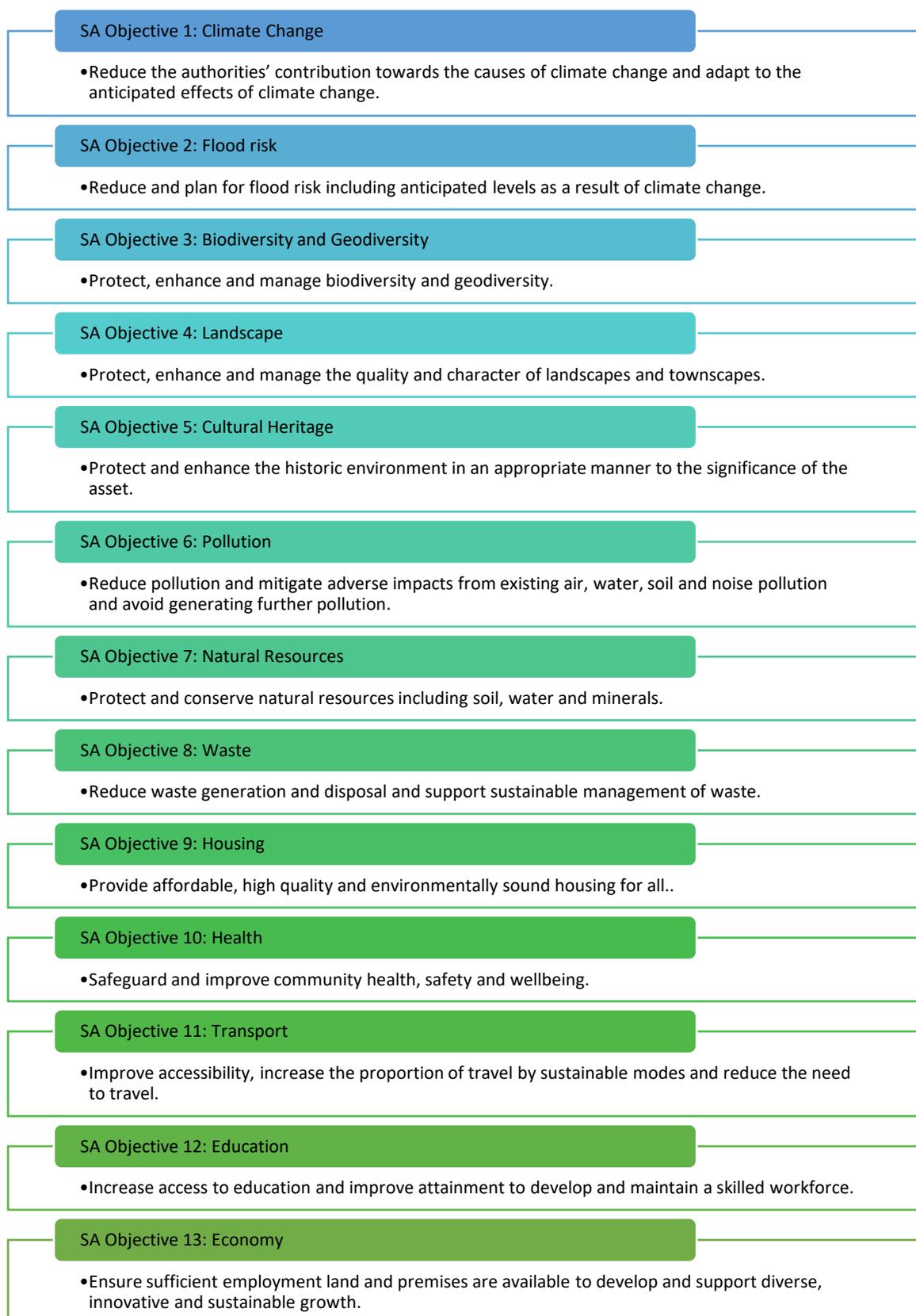


Figure N.5: SA Framework Summary

Reasonable alternatives: Identification, description and evaluation

- N24. The SEA Regulations state, as part of the requirements for preparing an environmental report, the local plan-making process must identify, describe and evaluate reasonable alternatives that have been considered.
- N25. There is no definitive guide as to what constitutes a ‘reasonable alternative’. A useful working definition is provided in the SEA/SA Planning Practice Guidance which states,
- “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings”.*
- N26. At this stage of plan-making the Councils have identified the following types of reasonable alternatives:
- Five Spatial Options which provide details about where housing and employment development should be distributed at a strategic scale across the Plan area;
 - Seven alternatives for New Settlement Locations for large scale development of not less than 6,000 new homes and associated infrastructure;
 - 32 Broad Locations which represent options for up to 2,000 homes located around the Main Settlements such as Warwick, Stratford-upon-Avon and Southam for medium scale, chiefly residential, development and associated infrastructure;
 - 22 Small Settlement Locations for intermediate scale, chiefly residential, development for between 50-500 homes in any one location, typically associated with smaller settlements and villages such as Wootton Wawen and Radford Semele; and
 - 116 Policy Options for shaping of the relevant policy. Subjects include, for example, climate change, tourism and employment.
- N27. The SA has assessed reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is the Councils’ role to use the SA findings, alongside other evidence base materials, to decide which alternatives to take forward in the plan-making process.
- N28. **Figure N.6** summarises the reasonable alternatives considered at this stage of the plan-making process.

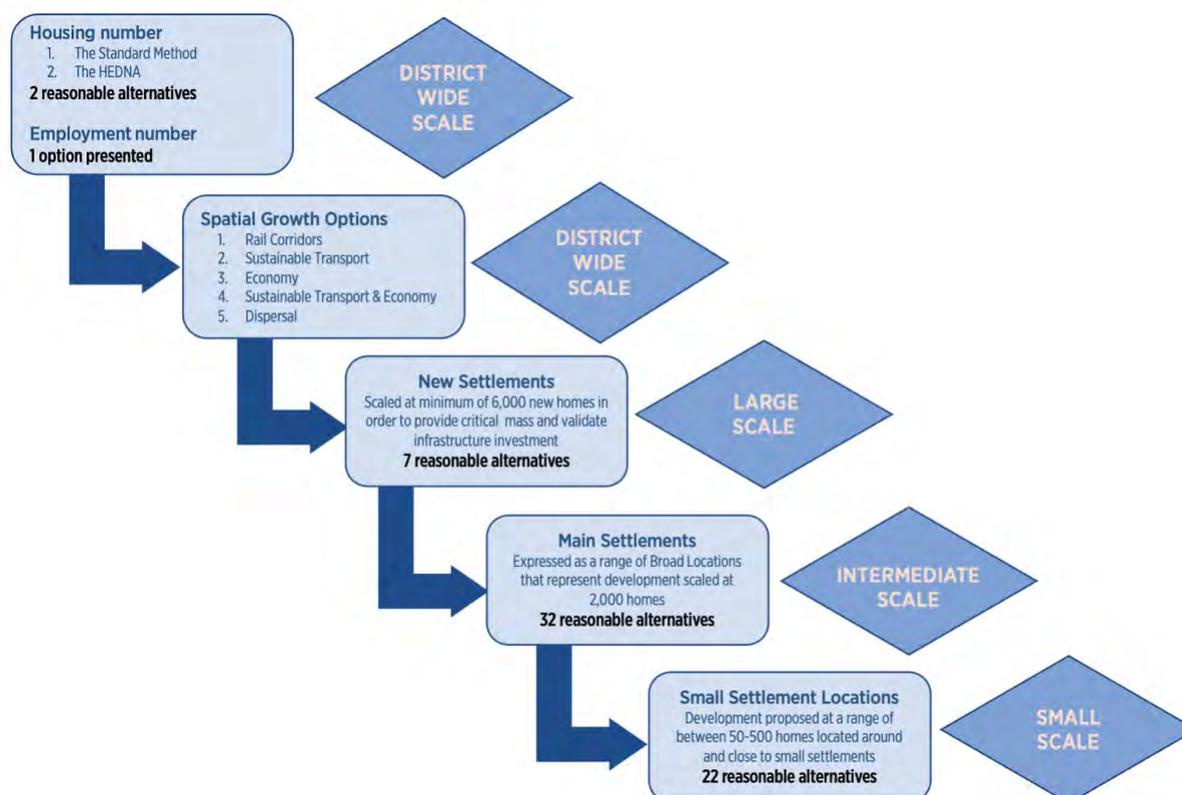


Figure N.6: Different scales of reasonable alternatives considered in this stage of Local Plan preparation

Purpose and content of the Regulation 18 Sustainability Appraisal report

N29. This Non-Technical Summary comprises Volume 1 of 3 documents prepared for this stage of the SA. The Main SA Report is Volume 2 and the Appendices to the Main SA Report comprise Volume 3. The contents of the Main SA Report and Appendices are as follows:

- **Chapter 1** - Background information about South Warwickshire and the SA process and topics.
- **Chapter 2** – Topic specific methodologies and assumptions.
- **Chapter 3** – Identification of reasonable alternatives.
- **Chapter 4** – Evaluation of the Broad Locations at the main settlements.
- **Chapter 5** – Evaluation of the Small Settlement Locations.
- **Chapter 6** – Evaluation of the New Settlement Locations.
- **Chapter 7** – Evaluation of the Spatial Growth Options.
- **Chapter 8** – Evaluation of the Policy Options.
- **Chapter 9** – Housing and Employment number option assessments
- **Chapter 10** – Conclusions and next steps.
- **Appendix A** – The full SA Framework.
- **Appendix B** –Detailed assessment information concerning potential receptors and impacts at the Broad Locations.
- **Appendix C** – Detailed assessment information concerning potential receptors and impacts at the Small Settlement Locations.

- **Appendix D** – Detailed assessment information concerning potential receptors and impacts at the New Settlement Locations.
- **Appendix E** – Assessment of the different policy options identified in the SWLP Issues and Options Consultation Document.

Reasonable alternatives: Housing and employment numbers

N30. The Issues and Options SA Report has assessed two housing numbers, summarised in **Table N.1**. These housing numbers were derived from the Housing and Economic Needs Assessment (HEDNA) trend-based projections (Option I) and the Government’s standard methodology, for calculating housing need as set out in Planning Practice Guidance (Option II). The methods for calculating housing need are described in more detail under Issue H1 of the Issues and Options document. While the HEDNA calculation of housing need identifies a lower overall figure for the sub-region, the annual housing need figures for the Stratford-on-Avon and Warwick Districts are higher than using the Standard Method.

Table N. 1: Reasonable alternative housing number calculations

Option I	The HEDNA trend-based projections point to a need for 4,906 dwellings annually across the whole sub-region with 868 dwellings per annum in Stratford-on-Avon and 811 dwellings per annum needed in Warwick. Combined total of 1,679 dwellings per annum .
Option II	The Standard Method calculation identifies a need for 5,554 dwellings annually across Coventry and Warwickshire, but with 564 dwellings per annum in Stratford-on-Avon and 675 dwellings per annum needed in Warwick. Combined total of 1,239 dwellings per annum .

N31. The assessment findings are summarised in **Table N.2**. Pursuing either of the options would result in a major positive impact on SA Objective 9 (Housing) as it is expected that the proposed housing numbers would largely cater to the housing needs of residents, including delivering affordable homes, student accommodation, older persons accommodation, specialist accommodation and self and custom build housing, along with the accommodation needs of gypsy and traveller and travelling showpeople communities. Using the HEDNA figure should more accurately represent local housing needs than the Standard Method and therefore Option I should meet the accommodation needs of the various members of the community more successfully.

N32. Both the housing number options could have negative impacts on SA Objectives 1, 3, 6 and 7. Substantial new housing development would be likely to give rise to major negative impacts on climate change and potentially have adverse impacts on biodiversity and result in pollution emissions. It is likely that a significant loss of Best and Most Versatile agricultural soils could not be avoided and a significant adverse impact on natural resources would be anticipated. The increase in waste generated from construction and occupation of housing would be likely to lead to a negative impact on SA Objective 8.

N33. Given the quality of the landscape across the plan area, delivering large scale housing development would potentially have an adverse impact on the landscape and townscape character. The impact of Option I on SA Objective 4 and 5 will be potentially higher than Option II due to higher housing numbers.

N34. Planning for the delivery of new housing to meet accommodations needs has the potential to locate people in closer proximity to their workplaces/employment sites for those living and working in the plan area and offers a greater likelihood of reduced travel times and more sustainable transport choices. As a result, a minor positive impact on SA Objective 13 could be expected.

N35. The consideration of housing number calculations does not provide any locational information as to where development would come forward and therefore impacts on SA Objectives 1, 5, 10 and 12, Flood Risk, Cultural Heritage, Health and Education are uncertain.

N36. In terms of identifying a best performing option, Option II performs better overall (see SA Objectives 1-8). In the case of some objectives, it is difficult to identify a best performing option (see SA Objectives 10, 11, 12 and 13).

Table N. 2: SA performance of the housing number options (extracted from Issues and Options SA Report)

	1	2	3	4	5	6	7	8	9	10	11	12	13
Options	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
Option I	--	+/-	-	--	+/-	-	--	-	++	+/-	-	+/-	+
Option II	--	+/-	-	--	+/-	-	--	-	++	+/-	-	+/-	+
Best performing	II	II	II	II	II	II	II	II	I	?	?	?	?

N37. No reasonable alternative employment floorspace options were identified. The HEDNA has considered employment land requirements across Coventry and Warwickshire to 2050. Within the SWLP area, a requirement of 345.3 hectares for office and general industrial land has been proposed to meet needs until 2050. For strategic B8 employment land (i.e. warehousing and distribution), a proportion of the sub-regional figure of 709 hectares will also be required.

N38. In the case of the plan area, the requirements for office space and general industrial uses have been apportioned to Warwick and Stratford-on-Avon as shown in **Table N.3**.

Table N. 3: Employment need calculation

	Office	General Industrial	Total
Stratford-on-Avon District	7.2	240.9	248.1
Warwick District	15.8	81.4	97.2

N39. The assessment findings are summarised in **Table N.4**. It is expected that the new employment land allocations and developments will generate more jobs and employment opportunities, create new investment opportunities and encourage creation of small and micro-businesses, therefore a major positive impact on SA Objective 13 is expected.

N40. It is assumed that the new employment opportunities would be beneficial for people living, visiting or working in the plan area in terms of job creation and the opportunity to develop skills, therefore a minor positive impact on SA Objective 12 (Education) is anticipated.

- N41. Development associated with new employment could have a major negative impact on SA Objectives 1 and 6 and minor negative impacts on SA Objective 3 as the increase in economic and industrial activities would give rise to adverse impacts on climate change and pollution emissions and could potentially be detrimental for the plan area’s biodiversity and geodiversity.
- N42. Given the high value and sensitivity of the landscape across the plan area, delivering the employment number and the spread of development could potentially have an adverse impact on the sub-region’s landscape and townscape character and a major negative impact on SA Objective 4 could occur.
- N43. With new economic development, there may be increased pressure on existing transport infrastructure to meet the transport needs of people living, visiting or working in the plan area and therefore it is assumed that SA Objectives 10 and 11 may be negatively impacted. The increase in waste generated from construction and occupation would translate into a minor negative impact on SA Objective 8.
- N44. With respect to the natural resources in the region, especially water and soil, large-scale economic and industrial development would affect the quality of these resources and thus a major negative impact on SA Objective 7 could also be anticipated.

Table N. 4: SA performance of the employment number option (extracted from Issues and Options SA Report)

1	2	3	4	5	6	7	8	9	10	11	12	13
Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
-	0	-	--	+/-	--	--	--	0	-	-	+	++

Reasonable alternatives: Spatial Growth Options

- N45. Spatial Growth Options set out the different locations across the plan area where development may be directed to meet the needs of South Warwickshire to 2050. The options seek to provide homes, jobs, green spaces and other infrastructure in the most suitable and sustainable places. The Councils have identified five Spatial Growth Options as follows:
- Option 1: Rail Corridors
 - Option 2: Sustainable Travel
 - Option 3: Economy
 - Option 4: Sustainable Travel and Economy
 - Option 5: Dispersed
- N46. Each option includes a list or framework of settlements that might be best placed to deliver each Spatial Growth Option. The settlement locations shown in the options are indicative and should not be taken as firm proposals. The assessment findings are summarised in **Table N.5.**

Table N. 5: SA Performance of the Spatial Growth Options

Spatial Option	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Rail Corridors	-	0	+/-	-	+/-	+	+	-	++	+/-	++	+/-	+
Sustainable Travel	-	0	-	+	+/-	+	+	-	++	+/-	+	+/-	+
Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	-	+/-	++
Sustainable Travel & Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	+	+/-	++
Dispersed	--	0	--	+	+	+/-	0	-	++	--	--	-	-

- N47. It should be noted that there is considerable overlap between some of the options. For example, Option 2 (Sustainable Travel) is a hybrid of rail corridor options and bus options presented in the 2021 Issues and Options scoping exercise⁵, making it similar in some respects to Option 1 (Rail Corridors). Option 4 (Sustainable Travel and Economy) is a hybrid of Spatial Growth Options 2 and 3.
- N48. Each Spatial Growth Option is evaluated by SA Objective and then ranked, since the SA scores have limited granularity (see **Table 2.1** in the methodology). The rank is a high level indication about which option would be likely to perform best when compared to each other. Whilst some options may have the same overall SA score, it is possible to specify that one would likely perform better than the other.
- N49. High level assessment of Spatial Growth Options that are not distinct from each other, with the exception of Option 5, means that sustainability performance can only be evaluated with several caveats. These include the fact that detailed locational information is not available and the ability to identify effects with precision is challenging. The scores in the summary assessment tables are strictly a guide and do not represent a diagnostic analysis. Mitigation has not been factored into the performance of the Growth Options since this is best worked up once more detailed locational information is available.
- N50. Different options are likely to perform better for certain SA Objectives than others. With this in mind, an overall best performing option is hard to identify. Option 5 is the worst performing option whilst Option 2 is likely to align most closely with development that will ultimately seek the most effective mitigation against climate change. These options will also deliver better performance in respect of pollution and natural resource impacts since development associated with these options would be slightly more concentrated than Options 3 and 4. However, whilst they all perform positively for employment and economy,

⁵ Scoping and Call for Sites Consultation. Available at: <https://www.southwarwickshire.org.uk/swlp/scoping-and-call-for-sites-consultation.cfm> [Date accessed: 22/11/22]

Options 3 and 4 perform the best in this respect. Without further detail, all options perform the same for waste and housing.

Reasonable alternatives: Broad Locations

N51. The initial list of settlements to be considered for this stage of the assessment were provided by the SWLP team and comprised:

- Alcester
- Kenilworth
- Royal Leamington Spa and Whitnash
- Shipston-on-Stour
- Southam
- Stratford-upon-Avon
- Warwick

N52. Lepus identified 32 Broad Locations surrounding these settlements, based on information in the South Warwickshire Settlement Analysis and seeking to support the principles of the 20-minute neighbourhood. The locations are shown on **Figure N.7**. The following principles were used to identify Broad Locations:

- 50% of the land parcel should be within 800m of at least one of the following services: public transport (train station or bus station), GP surgery, a primary school, a local shop and/or publicly accessible green space.
- Land with the following constraints was excluded from the assessment location: Flood Zones 2 or 3, Areas of Outstanding Natural Beauty, Grade 1 agricultural land, Scheduled Monuments, Sites of Special Scientific Interest, Registered Parks and Gardens and Ancient Woodland.

N53. The Broad Locations seek to accommodate up to 2,000 dwellings at a density of 35 dwellings per hectare. Housing to green space for green infrastructure should operate on a ratio of 60:40 of the total area. In other words, at least 40% of the land area should be planned for the provision of GI.

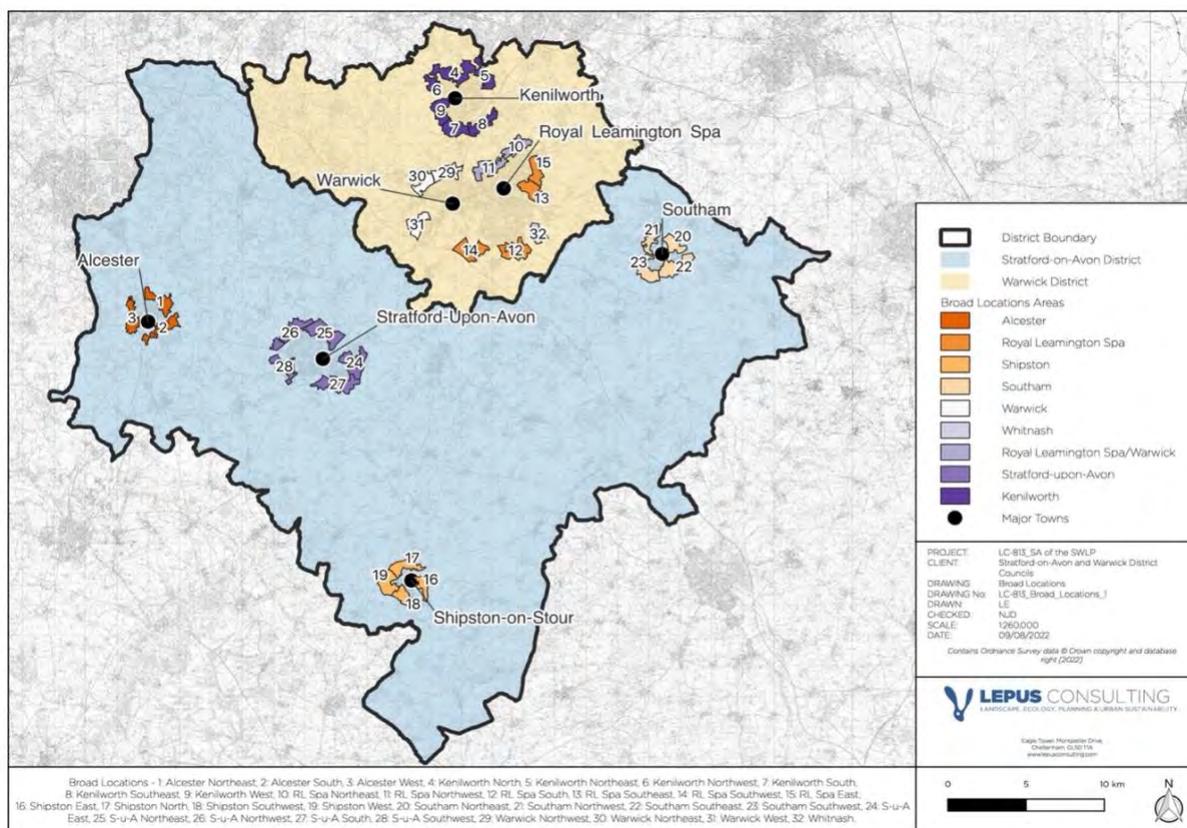


Figure N. 7: Map illustrating the Broad Locations

N54. **Table N.6** summarises the assessment findings for the Broad Locations under each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A** of the Main Report. The assessment of each indicator cannot be ‘added’ to create an overall score as this would give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix B** of the Main Report provides detailed assessments of each indicator under each SA Objective for the Broad Locations.

Table N. 6: SA performance of the Broad Locations: Summary assessments

Broad Locations	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Alcester Northeast	-	0	-	-	-	-	-	-	++	-	-	+	+
Alcester South	-	0	-	-	-	-	-	-	++	-	-	+	+
Alcester West	-	0	-	-	-	-	-	-	++	-	-	+	+
Kenilworth North	-	+	-	-	-	-	-	-	++	-	++	+	+
Kenilworth Northeast	-	+	-	-	-	-	-	-	++	-	-	+	+
Kenilworth Northwest	-	+	-	-	-	-	-	-	++	-	-	-	+
Kenilworth South	-	0	-	-	-	-	-	-	++	-	+	-	+
Kenilworth Southeast	-	+	-	-	-	-	-	-	++	-	-	-	+
Kenilworth West	-	+	-	-	-	-	-	-	++	-	-	-	+
Royal Leamington Spa East	-	+	-	-	-	-	-	-	++	-	-	+	+
Royal Leamington Spa Northeast	-	+	-	-	-	-	-	-	++	-	-	+	+
Royal Leamington Spa Northwest	-	+	-	-	-	-	-	-	++	-	-	+	+
Royal Leamington Spa South	-	+	-	-	-	-	-	-	++	-	-	-	+
Royal Leamington Spa Southeast	-	+	-	-	-	-	-	-	++	++	+	+	+
Royal Leamington Spa Southwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Shipston East	-	0	-	-	-	-	-	-	++	-	-	-	+
Shipston North	-	+	-	-	-	-	-	-	++	-	-	-	+
Shipston Southwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Shipston West	-	+	-	-	-	-	-	-	++	-	-	-	+
Southam Northeast	-	0	-	-	-	-	-	-	++	-	-	+	+
Southam Northwest	-	0	-	-	-	-	-	-	++	-	-	+	+
Southam Southeast	-	0	-	-	-	-	-	-	++	-	-	+	+
Southam Southwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Stratford-upon-Avon East	-	+	-	-	-	-	-	-	++	-	-	+	+
Stratford-upon-Avon Northeast	-	0	-	-	-	-	-	-	++	-	++	+	+
Stratford-upon-Avon Northwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Stratford-upon-Avon South	-	+	-	-	-	-	-	-	++	-	++	+	+
Stratford-upon-Avon Southwest	-	+	-	-	-	-	-	-	++	-	-	+	+
Warwick Northeast	-	+	-	-	-	-	-	-	++	-	-	-	+
Warwick Northwest	-	+	-	-	-	-	-	-	++	-	-	-	+
Warwick West	-	0	-	-	-	-	-	-	++	-	-	-	+
Whitnash	-	+	-	-	-	-	-	-	++	-	-	+	+

- N55. A summary of the SA findings for the Broad Locations is set out in the following points:
- **Flood risk:** Areas of higher flood risk (Flood zones 2 and 3) have largely been avoided in the identification of locations and the impacts of increased flood risk are likely to be negligible.
 - **Biodiversity:** All locations are in proximity to a Local Wildlife Site (LWS) and three BLs are coincident with a Local Nature Reserve (LNR).
 - **Landscape:** Many Broad Locations are within sensitive landscapes and Broad Locations at Shipton on Stour may have impacts on the AONB.
 - **Cultural heritage:** All locations have potential impacts on cultural heritage.
 - **Environmental pollution:** All locations have a potential minor adverse effect on environmental pollution.
 - **Natural resources:** All locations could result in a significant loss of Best and Most Versatile agricultural land.
 - **Health:** Over half of the Broad Locations are within the target distance to an existing GP surgery and a leisure centre and many Broad Locations lie outside an Air Quality Management Area, except in Stratford and north Kenilworth. All Broad Locations have good access to greenspace.
 - **Accessibility:** Most Broad Locations have access to an existing bus stop and 16 have good access to a train station. Mixed effects have been identified in relation to the accessibility of the Broad Location to the existing settlement.
 - **Education:** 31 Broad Locations are in proximity to a primary school and 23 have good access to a secondary school.
 - **Employment:** All BLs are in proximity to opportunities for employment.
- N56. All Broad Locations perform similarly against the climate change objective. Large scale residential-led development is likely to result in an increase in Greenhouse Gas emissions. Development of up to 2,000 dwellings could increase carbon emissions in the Local Plan area by more than 1% of the existing CO₂ emission levels and result in a major adverse impact.
- N57. All Broad Locations could deliver up to 2,000 dwellings and could increase waste in the Plan area by more than 1%. The 1% principle is limited and only a coarse precautionary indicator. All locations perform in the same way and will lead to significant increases in waste.
- N58. All Broad Locations perform very well against SA Objective 9 as all locations would deliver residential-led developments and a net gain of up to 2,000 houses to be expected. This would contribute significantly to local housing needs and would be a major positive impact on housing provision.

Reasonable alternatives: Small Settlement Locations

- N59. A total of 22 reasonable alternative development locations have been identified around the following small settlements:

- | | |
|---|---|
| <ul style="list-style-type: none">• Barford• Bearley• Bidford• Bishop's Tachbrook• Claverdon• Cubbington• Earlswood• Hampton Magna• Hatton Park• Hatton Station• Henley | <ul style="list-style-type: none">• Kineton• Kingswood• Long Itchington• Radford Semele• Salford Priors• South Coventry• Studley• Wellesbourne• Wilmcote• Wood End• Wootton Wawen |
|---|---|

N60. The initial list of 22 settlements to be considered was provided by the SWLP team. The locations are shown on **Figure N.8**. Lepus identified a study area for assessment surrounding each settlement based on the following criteria:

- 50% should be within 400m of the settlement edge.
- 50% should be within 800m of at least one of the following services: public transport (train station or bus station), GP surgery, a primary school, a local shop and/or publicly accessible green space.
- Land with the following constraints was excluded from the assessment location: Flood Zones 2 or 3, Areas of Outstanding Natural Beauty, Grade 1 agricultural land, Scheduled Monuments, Sites of Special Scientific Interest, Registered Parks and Gardens and Ancient Woodland.

N61. The small settlement locations seek to accommodate between 50 and 500 units at a dwelling per hectare scale of 35dph. Housing to green space for green infrastructure should operate on a ratio of 60:40 of the total area. In other words, at least 40% of the land area should be planned for the provision of GI.

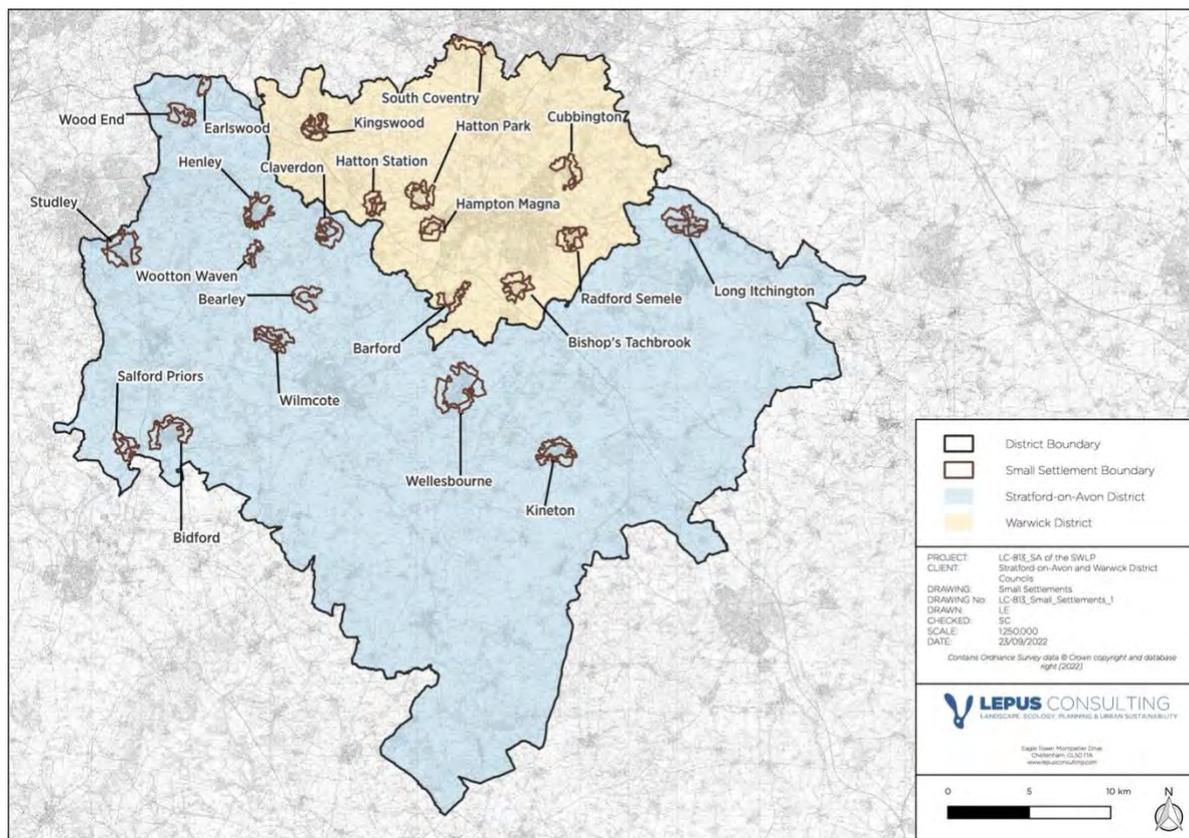


Figure N.8: Map illustrating the Small Settlement Locations

Summary of SA findings for Small Settlement Locations

N62. **Table N.7** summarises the sustainability performance of each Small Settlement Location under each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A**. The assessment of each indicator cannot be ‘added’ to create an overall score as this would be give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix C** of the Main Report provides detailed assessments of each indicator under each SA Objective.

Table N. 7: SA performance of the Small Settlement Locations: Summary assessments

Small Settlement	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Barford	-	0	-	+	-	-	+	-	++	-	-	-	+
Bearley	-	+	+	+	-	-	+	-	++	-	-	-	+
Bidford	-	0	-	-	-	-	+	-	++	-	-	-	+
Bishop's Tachbrook	-	0	-	+	-	-	+	-	++	-	-	-	+
Claverdon	-	+	-	+	-	-	+	-	++	-	-	-	+
Cubbington	-	0	-	+	-	0	+	-	++	-	-	-	+
Earlswood	-	+	-	+	-	0	+	-	++	-	-	-	+
Hampton Magna	-	+	-	+	-	-	+	-	++	-	++	-	+
Hatton Park	-	0	-	+	-	-	+	-	++	-	-	-	+
Hatton Station	-	0	-	+	-	-	+	-	++	-	-	-	+
Henley	-	0	-	+	-	-	+	-	++	-	-	-	+
Kineton	-	0	-	+	+	-	+	-	++	-	++	+	+
Kingswood	-	0	-	+	-	-	+	-	++	-	++	-	+
Long Itchington	-	0	-	+	-	-	+	-	++	-	-	-	+
Radford Semele	-	0	-	+	-	-	+	-	++	-	-	+	+
Salford Priors	-	0	-	+	-	-	+	-	++	-	-	-	+
South Coventry	-	+	-	+	-	-	+	-	++	-	-	-	+
Studley	-	0	-	+	-	-	+	-	++	-	-	-	+
Wellesbourne	-	0	-	+	-	-	+	-	++	-	-	-	+
Wilmcote	-	0	+	+	-	-	+	-	++	-	-	-	+
Wood End	-	0	+	+	-	-	+	-	++	-	++	-	+
Wootton Wawen	-	0	-	+	-	-	+	-	++	-	++	-	+

N63. A summary of the SA findings for the Small Settlement Locations is set out below:

- **Flood risk:** Flood zones have largely been avoided in the identification of locations. Impacts would be negligible.

- **Biodiversity:** Many locations are in proximity to a Site of Special Scientific Interest (SSSI) and ancient woodland. Three are coincident with a SSSI. All locations are in close proximity to a LWS.
- **Landscape:** All locations are within sensitive landscapes.
- **Heritage:** All locations have potential impacts on cultural heritage.
- **Environmental pollution:** Small settlements Cubbington and Earlswood are the only locations which have been assessed as having a negligible impact on pollution, with all other small settlements likely to have some adverse impacts.
- **ALC:** All locations could result in loss of Best and Most Versatile agricultural land.
- **Health:** Barford, Bishop's Tachbrook, Hampton Magna, Hatton Park, and Studley largely meet the target distance to an A&E department. Eleven locations are within the target distance to an existing GP surgery. All locations, except South Coventry, lie outside an AQMA.
- **Accessibility:** Many locations have access to a bus stop and 12 have good access to a train station. Mixed effects have been identified in relation to accessibility to the existing settlement.
- **Primary schools:** 17 locations are in proximity to a primary school
- **Education:** Many locations are not in proximity to a secondary school.

N64. All small settlement locations perform similarly against the climate change objective. This scale of residential-led development is likely to result in an increase in Greenhouse Gas emissions. Development of up to 50-500 dwellings could increase carbon emissions in the Local Plan area by less than 1% of the existing CO₂ emission levels and result in a minor adverse impact.

N65. All small settlement locations could deliver up to 50-500 dwellings and could increase waste in the Plan area by less than 1%. The 1% principle is limited and only a coarse precautionary indicator. All locations perform in the same way and will lead to increases in waste.

N66. All small settlement locations perform very well against SA Objective 9 as all locations would deliver residential-led developments with a net gain of up to 50-500 houses to be expected. This would contribute significantly to local housing needs and would result in a major positive impact on housing provision.

New Settlements

N67. The Councils have been considering the potential to meet housing need through the creation of a new settlement/s. Following the Councils' initial assessment, seven potential locations were identified, as set out in the Issues and Options Consultation document. The locations are shown on **Figure N.9**.

N68. At this stage, the sustainability performance of the locations has been assessed without considering the potential to mitigate impacts, for example, through the provision of new infrastructure such as schools, shops, community facilities and transport improvements. The Councils will continue to work with infrastructure providers throughout the plan-making process to establish need and consider the feasibility of delivering new infrastructure.

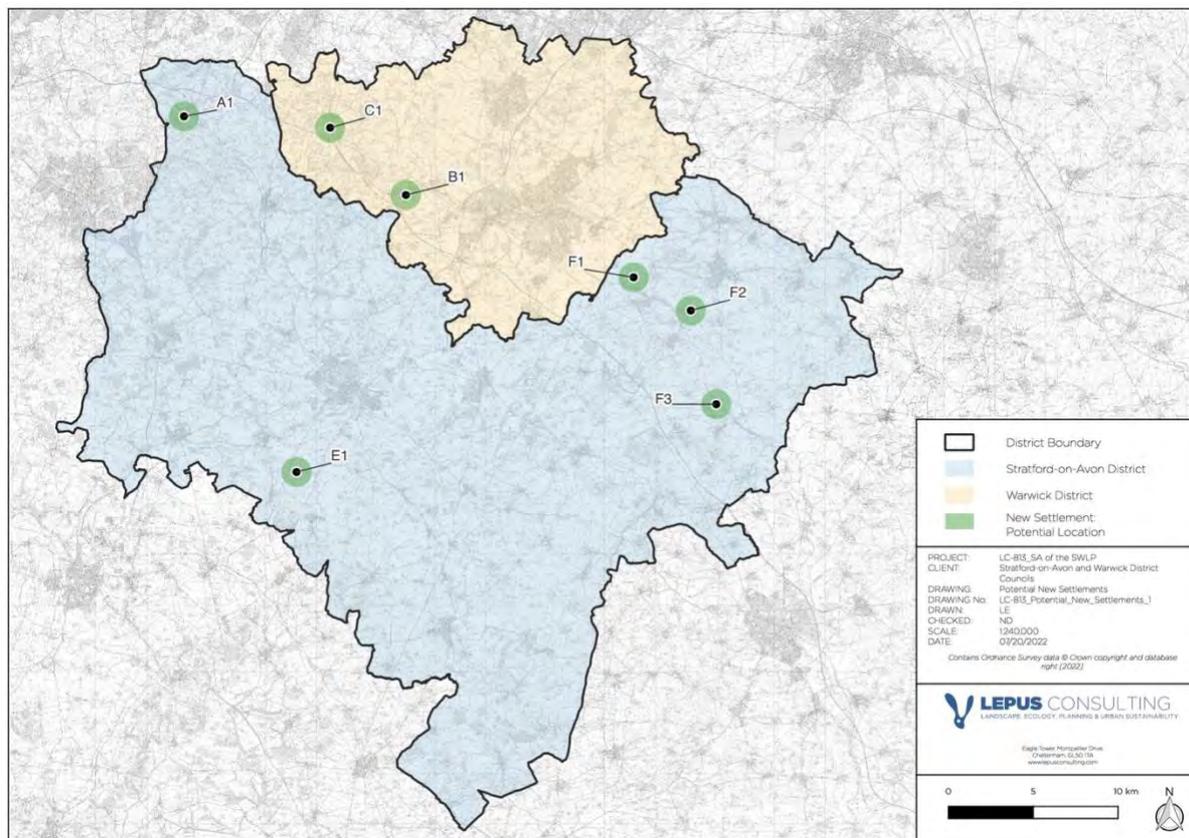


Figure N.9: Map illustrating the New Settlement Locations

N69. Each potential new settlement location is approximately 250ha and would be located within proximity to existing or former railway lines. The seven potential settlement locations are distributed across the Plan area, with two locations in Warwick and five located in Stratford-on-Avon.

- The majority of the new settlement locations perform well or reasonably against cultural heritage indicators;
- All new settlements performed strongly against housing and economy;
- The majority of new settlements performed well for connectivity to railways, access to greenspace and access to public rights of way and cycle networks;
- All new settlements perform poorly against climate change (overall) and waste;
- Most new settlements perform poorly against natural resources and landscape;
- There was variation in the performance of the new settlements against flood risk, pollution, health, education and biodiversity; and
- All new settlements are likely to adversely impact LWSs and some new settlements are likely to adversely impact SSSIs.

N70. All new settlements perform similarly against the climate change objective. Large scale residential-led development is likely to result in an increase in Greenhouse Gas emissions. Development of up to 6,000 dwellings could increase carbon emissions in the Local Plan area by more than 1% of the existing CO₂ emission levels and result in a major adverse impact.

- N71. All new settlements could deliver up to 6,000 dwellings and could increase waste in the Plan area by more than 1%. The 1% principle is limited and only a coarse precautionary indicator. All locations perform in the same way and will lead to significant increases in waste.
- N72. All new settlements perform very well against SA Objective 9 as all locations would deliver residential-led developments and a net gain of up to 6,000 houses to be expected. This would contribute significantly to local housing needs and would be a major positive impact on housing provision.
- N73. All new settlements would be expected to result in a permanent loss of ALC Grade 3 or above soils following development.
- N74. All new settlements would be expected to positively impact the access of site end users to employment opportunities.

Summary of findings for the potential New Settlement Locations

- N75. **Table N.8** summarises the assessment findings for the New Settlement locations for each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A** of the Main SA Report. The assessment of each indicator cannot be 'added' to create an overall score as this would give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix D** of the Main SA Report provides detailed assessments of each indicator under each SA Objective.

Table N. 8: SA performance of the New Settlement Locations: Summary assessments

New Settlements	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
A1	-	-	+	-	-	-	-	-	++	-	-	-	+
B1	-	-	+	-	-	-	-	-	++	-	-	-	+
C1	-	-	+	-	-	-	-	-	++	-	-	-	+
E1	-	-	-	-	0	-	-	-	++	-	-	-	+
F1	-	-	+	-	-	-	-	-	++	-	-	-	+
F2	-	-	-	-	-	-	-	-	++	-	-	-	+
F3	-	-	-	-	-	-	-	-	++	-	-	-	+

Reasonable alternatives: Policy options

- N76. A range of policy options for consideration have been identified by the Councils, as part of the Issues and Options Consultation for the emerging Local Plan. The policy options

include those for delivering the area's economic and housing needs as well as covering various development management aspects. The assessments have identified the best performing option for each policy where possible. In some circumstances it is recommended that a combination of options could potentially result in the most sustainability benefits.

Delivering South Warwickshire's Economic Needs

- N77. Considering the location of SWLP area and its objectives for economic growth, the policy options consider greening, diversifying and sustaining the local economy. The policy options also address protecting and leveraging on the region's unique assets and building upon new investment sites. The policy options for the economy had positive impacts upon many SA Objectives, except for the ones pertaining to climate change, landscape, pollution and cultural heritage.

Delivering Homes That Meet the Needs of All Our Communities

- N78. Addressing homelessness and affordability issues, the housing policy options range from housing needs and space standards to custom plots, and pitches and plots for gypsies, travellers and showpeople. Most of the policy options were favourable in regard to the health and wellbeing of the people living, visiting or working in the Plan area. Some uncertainty or minor negative effects were identified with regard to waste.

A Climate Resilient and Net Zero South Warwickshire

- N79. In alignment with the target to reach net zero by 2050 and declaration of a climate emergency in 2019 by both the Councils, the policy options seek to deliver reduced Greenhouse Gas emissions in the business, housing and transport sectors. The policy options presented are set out as 'having a climate change policy' which could have positive impacts on certain SA Objectives, whereas the lack of a climate change policy (as recommend in some policy options) could be detrimental for the plan area in the long run.

A Healthy, Safe and Inclusive South Warwickshire

- N80. In alignment with NPPF's policies for healthy, safe and inclusive places, the policy options for SWLP cater to pollution, Health Impact Assessments and having an overall policy on health. Options that favour having a policy would have positive impacts on SA Objectives, as opposed to the options that do not favour them.

A Well-Designed and Beautiful South Warwickshire and A Well Connected South Warwickshire

- N81. The policy options for strategic design policy, protecting and enhancing heritage assets have been considered in conjunction with the 20-minute neighbourhoods and other connectivity matters. The option to have no policies covering connectivity and accessibility could potentially have a negative impact on SA objectives pertaining to climate change and pollution, as opposed to options that recommend having a policy.

A Biodiverse and Environmentally Resilient South Warwickshire

- N82. With the objective to strengthen green and blue infrastructure and achieve Biodiversity Net Gain, the policy options may lead to positive outcomes across a range of SA Objectives beyond environmental benefits, including, economy, flooding and health and wellbeing.

- N83. Options that recommend having policies for areas of restraints, to protect special landscapes and achieve environmental net gain have positive impact on several SA objectives.

Summary

- N84. All reasonable alternatives have been evaluated using a wide range of receptors, sources and indicators. The likely impacts from development at different scales have been estimated and the results provide some idea, initially, about how different reasonable alternatives will perform in terms of sustainable development.
- N85. There are limitations to the assessment process and assumptions have been stated in the methodology section (see **Chapter 2** of the Main SA Report). Notwithstanding these, it is now possible to consider some of the results and what should be considered as the plan making moves into a key stage of public consultation.
- N86. The Councils will now assimilate the information and incorporate this into the next round of consultation before making decisions on selection and rejection. It is a requirement to identify the best performing reasonable alternatives, which has been set out in the preceding chapters. Public consultation will help clarify the status of these best performing options which have been identified using an extensive analysis of secondary data.

Further Research

- N87. The following additional research is recommended to better inform the SA of the SWLP:
- Biodiversity assessments of the Broad Locations;
 - Landscape Assessment to explore character, sensitivity and capacity at the BLs;
 - Air Quality impact assessment at the plan level; and
 - Cultural Heritage evaluation at the Broad Location scale.



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Sustainability Appraisal of the South Warwickshire Local Plan

Regulation 18: Issues and Options Stage

Volume 2 of 3: Main Sustainability Appraisal Report

November 2022



Sustainability Appraisal of the South Warwickshire Local Plan

Regulation 18: Issues and Options Stage

Volume 2 of 3: Main SA Report

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About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this report for the use of Stratford-on-Avon and Warwick District Councils. There are a number of limitations that should be borne in mind when considering the conclusions of this report. No party should alter or change this report without written permission from Lepus.

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This SA Report of the Issues and Options stage is based on the best available information, including that provided to Lepus by Stratford-on-Avon and Warwick District Councils and information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published. This report was prepared between June and November 2022 and is subject to and limited by the information available during this time. This report has been

produced to assess the sustainability effects of the South Warwickshire Local Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms & Abbreviations

A&E	Accident and Emergency	MSA	Minerals Safeguarding Area
ALC	Agricultural Land Classification	NNR	National Nature Reserve
AONB	Area of Outstanding Natural Beauty	NO₂	Nitrogen Dioxide
AQMA	Air Quality Management Area	NPPF	National Planning Policy Framework
BL	Broad Location	NRN	Nature Recovery Network
BMV	Best and most versatile	ONS	Office for National Statistics
CAMS	Catchment Abstraction Management Strategy	OS	Ordnance Survey
DBEIS	Department for Business, Energy and Industrial Strategy	PM₁₀	Particulate Matter (10 micrometres)
DEFRA	Department for Environment, Food and Rural Affairs	PPG	Planning Practice Guidance
DfT	Department for Transport	PRoW	Public Rights of Way
EA	Environment Agency	RBMP	River Basin Management Plan
EU	European Union	RIGS	Regionally Important Geodiversity Site
GHG	Greenhouse gas	RLS	Royal Leamington Spa
GI	Green Infrastructure	RPG	Registered Park and Garden
GIS	Geographical Information System	SA	Sustainability Appraisal
GP	General Practitioner	SAC	Special Area of Conservation
ha	Hectare	SEA	Strategic Environmental Assessment
HER	Historic Environment Record	SM	Scheduled Monument
HGV	Heavy Goods Vehicle	SPA	Special Protection Area
HLC	Historic Landscape Characterisation	SPZ	Source Protection Zone
HRA	Habitats Regulations Assessment	SSSI	Sites of Special Scientific Interest
IRZ	Impact Risk Zone	SuDS	Sustainable Drainage System
KWS	Key Wildlife Site	SWLP	South Warwickshire Local Plan
LCT	Landscape Character Type	UNFCCC	United Nations Framework Convention on Climate Change
LNR	Local Nature Reserve	WCS	Water Cycle Study
LTP	Local Transport Plan	WHS	World Heritage Site
LWS	Local Wildlife Site	WRMP	Water Resources Management Plan
LVIA	Landscape and Visual Impact Assessment	ZOI	Zone of Influence
MHCLG	Ministry of Housing, Communities and Local Government		

Executive Summary

About this report

- E1 Lepus Consulting is conducting a Sustainability Appraisal process for the South Warwickshire Local Plan (SWLP) Authorities of Stratford-on-Avon District Council and Warwick District Council to help them prepare the SWLP. The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages to facilitate iteration between the Plan makers (the SWLP Authorities) and the appraisal team (Lepus Consulting).
- E2 SA is the process of informing and influencing the preparation of a development plan to optimise its sustainable development performance as the plan is prepared over several distinct stages including examination in public, and finally, adoption.

Assessing the Issues and Options Version of the South Warwickshire Local Plan

- E3 The current plan making phase is called the Issues and Options stage. The Issues and Options consultation is the second stage in preparing the South Warwickshire Local Plan, following the Scoping and Call for Sites consultation that took place in 2021. A Local Plan sets out the planning policies that the councils will use to assess applications for development as well as identifying (allocating) sites for new development proposals to meet the future development needs in terms of housing and job growth.
- E4 To help the Councils ensure that the new Local Plan includes the most suitable planning policies and development allocations, the sustainability appraisal identifies, describes and evaluates a number of different reasonable alternative policies and development locations.

Identification of reasonable alternatives

- E5 The Councils have recognised that they wish to explore the following reasonable alternatives as part of the plan making process:
- 5x Growth Options which provide details about where housing and employment development should be distributed at a strategic scale across the Plan area;
 - 7x New Settlement Locations for large scale development of not less than 6,000 new homes and associated infrastructure;
 - 32x Broad Locations (BL) which represent options for up to 2,000 homes located around the Main Settlements such as Warwick, Stratford-upon-Avon and Southam for medium scale, chiefly residential, development and associated infrastructure in any one BL
 - 22x Small Settlement Locations (SSL) for intermediate scale, chiefly residential, development for between 50-500 homes in any one location, typically associated with smaller settlements and villages such as Wootton Wawen and Radford Semele; and
 - 116x Policy options for shaping of the relevant policy. Subjects include for example climate change, tourism and employment.

Description of the reasonable alternatives

- E6 The Issues and Options Consultation Version of the SWLP provides descriptions of the reasonable alternative Housing Number Options, Growth Options, New Settlement Options and Policy Options.
- E7 The sustainability appraisal process has been used to help identify different locational reasonable alternatives. Following receipt of the areas of search to be used for each types of location, Geographic Information Systems have been used to help identify boundaries for the 32 BLs and 22 SSLs.
- E8 A total of 32 BL reasonable alternatives have been identified using principles associated with 20-minute neighbourhoods. Such principles include planning for the liveability of neighbourhoods, with an emphasis on people spending more time locally, working at home if possible, using public green space, cycling and walking instead of using cars and connecting with neighbours.
- E9 The following settlements have been used to identify Broad Locations that are within 20 minutes' walk or ride (approximately 800m in any one direction) from key services such as public transport access point, (train station or bus station), GP surgery, a primary school, or supermarket:
- Alcester;
 - Kenilworth;
 - Royal Leamington Spa and Whitnash;
 - Shipston;
 - Southam;
 - Stratford-upon-Avon, and;
 - Warwick.
- E10 All BLs have been identified to be capable of delivering up to 2,000 homes and significant areas of greenspace to facilitate effective green infrastructure planning. Each BL is identified in **Chapter 4** and **Appendix B** of this report.
- E11 A total of 22 reasonable alternative SSLs have been identified using 20 minute neighbourhood principles and scaled accordingly. The small settlements have been used to identify SSLs that are within easily accessible on foot or by riding (approximately 400m in any one direction) from key services in the settlement. These SSLs are:
- Barford;
 - Bearley;
 - Bidford;
 - Bishop's Tachbrook;
 - Claverdon;
 - Cubbington;
 - Earlswood;
 - Hampton Magna;
 - Hatton Park;
 - Hatton Station;
 - Henley;
 - Kineton;
 - Kingswood;

- Long Itchington;
- Radford Semele;
- Salford Priors;
- South Coventry;
- Studley;
- Wellesbourne;
- Wilmcote;
- Wood End; and
- Wootton Wawen

E12 All SSLs have been identified to be capable of delivering between 50 and 500 new dwellings and significant areas of greenspace to facilitate effective green infrastructure planning. Each SSL is identified in **Chapter 5** and **Appendix C** of this report.

E13 A total of seven New Settlements have been evaluated alongside five growth options. Both these types of reasonable alternative have been identified through earlier consultation on the SWLP which took place in 2021.

Evaluation of the reasonable alternatives

E14 The appraisal process has used a tool called the SA Framework to evaluate how the different reasonable alternatives perform against sustainability objectives.

E15 The SA Framework provides a way in which sustainability effects can be described, analysed and compared. SA Objectives and indicators can be revised as further baseline information is collected and sustainability issues and challenges are identified and are used in monitoring the implementation of the Local Plan.

E16 Evaluation of the Spatial Growth Options, Broad Locations, Small Settlements and New Settlements all include a summary, by SA Objective, of best performing options. Any exercise to identify best performing options which has been prepared at the desktop level has its limitations. These are set out in the methodology. Readers are encouraged to recognise that the scores used in the technical appendices are a guide and that the full evaluation of all reasonable alternatives can be found in the narrative text accompanying the scores and in the main body of the report.

E17 At this stage it is difficult to identify overall stand out best performing options because they all perform 'best' for different SA Objectives and rarely does one option emerge as a best overall option.

E18 It is however possible to begin to identify consistently poor-performing options and these should be possibly removed from further consideration. For example, Stratford Northeast.

Next steps

E19 This Regulation 18 Issues and Options SA Report is subject to consultation alongside the Issues and Options version of the SWLP.

E20 This report represents the latest stage of the SA process. The SA process will take on board any comments on this report and use them to furnish the next report with greater detail and accuracy.

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1 Introduction

1.1 This report

- 1.1.1 Stratford-on-Avon District and Warwick District Councils have commissioned Lepus Consulting to carry out a Sustainability Appraisal (SA) of the South Warwickshire Local Plan (SWLP).
- 1.1.2 The purpose of this SA report is to assess the sustainable development implications of proposals presented in the Issues and Options Consultation Version of the South Warwickshire Local Plan (SWLP).
- 1.1.3 A wide range of reasonable alternative policy and growth options have been identified through the plan making phase known as Issues and Options. The sustainability appraisal outputs will help the SWLP Authorities to identify sustainable development options and prepare a local plan which is economically, environmentally, and socially sustainable.
- 1.1.4 A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

1.2 The SWLP area

- 1.2.1 Stratford-on-Avon District and Warwick District Councils together comprise roughly 126,390ha, with a combined population of approximately 283,200 people according to the Office for National Statistics (ONS) Census data for 2021¹.
- 1.2.2 Stratford-on-Avon District and Warwick District lie within the south of Warwickshire County. As illustrated in **Figure 1.1**, the majority of Stratford-on-Avon District is largely rural in nature. In contrast, Warwick District covers a smaller geographic area and is more densely populated.
- 1.2.3 The town of Royal Leamington Spa is the most populous town in the Plan area with a population of roughly 52,000. The town is characterised by its regency architecture. Royal Leamington Spa is adjoined with the town of Warwick in the west, Whitnash town in the south and is adjacent to Cubbington village. The river Leam runs through Royal Leamington Spa.
- 1.2.4 The town of Stratford-upon-Avon has a population of approximately 29,984. Stratford-upon-Avon is a medieval market town situated on the River Avon. The town has strong associations with its heritage interests and numerous Grade I, Grade II* and Grade II listed buildings are situated within it.
- 1.2.5 Together the two authorities contain important biodiversity sites, high quality landscape, and a wealth of historic assets. Notable features include the Cotswolds AONB which covers a small proportion of Stratford-on-Avon district in the south, Warwick Castle which is a Grade I listed building, as well as Registered Park and Gardens and the significant amount of Greenbelt land which cover the northern area of both districts.

¹ Office for National Statistics (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> [Date accessed: 01/11/22]

1.2.6 In general, the SWLP area has good connections through national and regional transport infrastructure, although there are some issues with rural accessibility^{2,3}. The area provides approximately 159,200 jobs⁴.

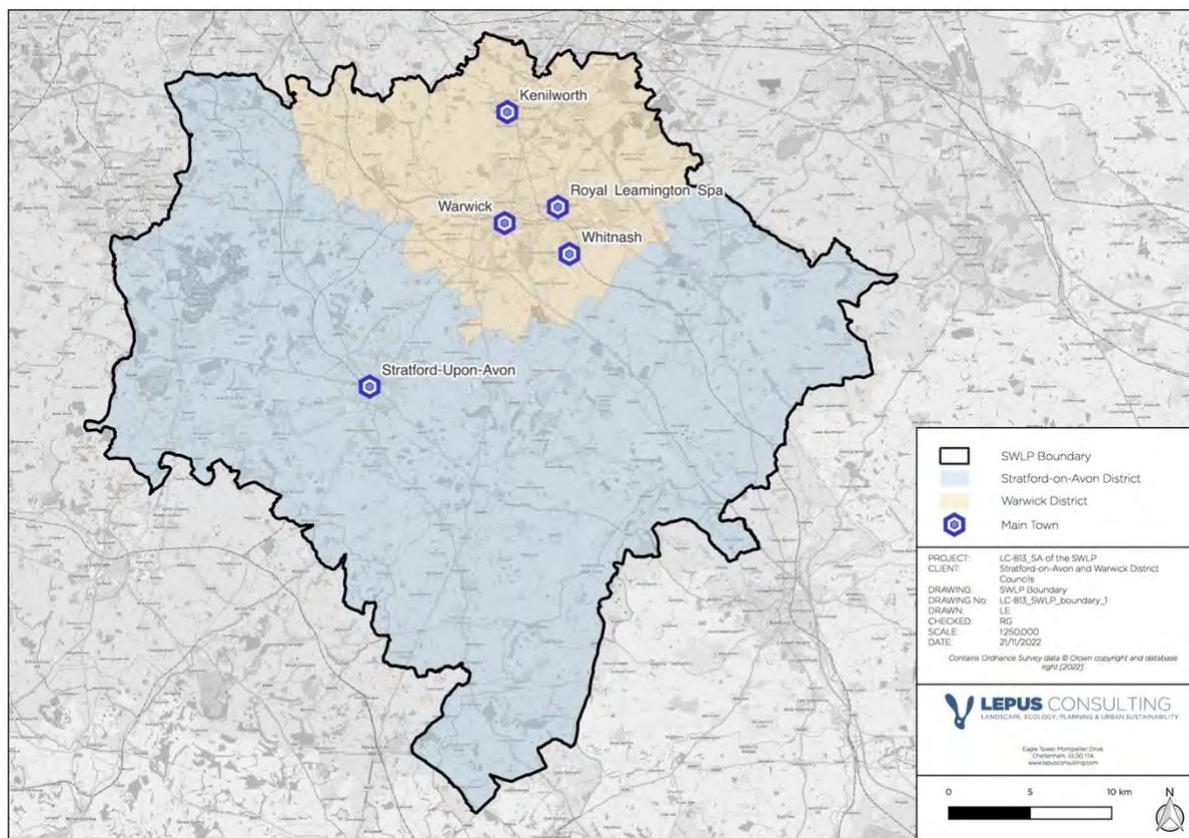


Figure 1.1: Stratford-on-Avon District Council and Warwick District Council administrative boundaries

² Warwick District Council (2015) TA1 – Warwick and Leamington Spa Transport Strategy – Sustainable Transport. Available at: https://www.warwickdc.gov.uk/downloads/file/2305/ta1_-_warwick_and_leamington_spa_transport_strategy_-_sustainable_transport_final_with_appendices_part_2_-_january_2015 [Date accessed: 21/06/22]

³ Stratford-on-Avon District Council (2012) Strategic Transport Assessment. Available at: <https://www.stratford.gov.uk/planning-building/technical-evidence.cfm> [Date accessed: 21/06/22]

⁴ Office for National Statistics (2020) Local Authority district – Business Register and Employment Survey. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/localauthoritydistrictbusinessregisterandemploymentsurveybrestable6> [Date accessed: 21/06/22]

1.3 The SWLP

- 1.3.1 The SWLP will consider the future growth needs, the overall strategy for delivering development across the Plan area, and the allocation of strategic sites to help meet these needs. The SWLP provides an opportunity to review and if necessary, amend and update the policies contained with the various adopted land use plans currently in operation throughout both districts to ensure that they continue to be effective and consistent with up-to-date planning policy requirements and best practice.
- 1.3.2 Key facts relating to the SWLP are presented in **Table 1.1**.

Table 1.1: Key facts relating to the SWLP

Responsible authority x2	Stratford-on-Avon District Council and Warwick District Council
Title of plan	South Warwickshire Local Plan
What prompted the plan (e.g. legislative, regulatory or administrative provision)	The SWLP is being prepared in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and The Town and Country Planning (Local Development) (England) Regulations 2012.
Area covered by the plan	Stratford-on-Avon District and Warwick District (see Figure 1.1).
Purpose and/or objectives of the plan	<p>The SWLP will set out the spatial planning strategy for the area, having due regard to other strategies and programmes.</p> <p>The SWLP will set out a long term strategy for how and where development should take place, the locations of new homes, services, and employment sites and how communities can meet their needs for housing and development and how the plan can respond to climate change. The Plan will replace the strategic policies of the existing Stratford-on-Avon District Core Strategy and Warwick District Local Plan.</p>
Contact point	<p>Stratford-on-Avon District Council The SWLP Team, Stratford on Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon, CV37 6HX swlp@stratford-dc.gov.uk</p> <p>Warwick District Council The SWLP Team Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5HZ swlp@warwickdc.gov.uk</p>

1.4 Sustainability Appraisal and Strategic Environmental Assessment

- 1.4.1 The requirements to carry out SA and SEA are distinct, although government policy advocates that both processes can be delivered using a single, integrated appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC⁵ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport etc. (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 1.4.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁶ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the SWLP to be subject to SEA throughout its preparation.
- 1.4.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19(5) of the Planning and Compulsory Purchase Act 2004⁷ and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA resides in the Town and Country Planning (Local Planning) (England) Regulations 2012⁸. SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.4.5 Public consultation is an important aspect of the integrated SA/SEA process.

⁵ European Commission (2018) SEA. Available at: <https://ec.europa.eu/environment/eia/sea-legalcontext.htm> [Date accessed: 21/06/22]

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 25/04/22]

⁷ Planning and Compulsory Purchase Act (2004). Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 25/04/22]

⁸ Town and Country Planning (Local Planning) (England) Regulations (2012). Available at: <http://www.legislation.gov.uk/ukxi/2012/767/contents/made> [Date accessed: 25/04/22]

1.5 Best Practice Guidance

1.5.1 Government policy recommends that both SA and SEA are undertaken under a single process, which incorporates the requirements of the SEA Directive. This is to be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment⁹
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹⁰
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹¹
- Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework (NPPF)¹² Paragraph 32.
- Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance (PPG)¹³

1.5.2 SA is an iterative process which should be undertaken alongside development of the SWLP to maximise its sustainability performance as summarised in **Figure 1.2**.

⁹ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 25/04/22]

¹⁰ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practical_guidesea.pdf [Date accessed: 25/04/22]

¹¹ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 25/04/22]

¹² Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 25/04/22]

¹³ Department for Levelling Up, Housing and Communities & Ministry of Housing, Communities and Local Government (2021) Planning practice guidance. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 25/04/22]

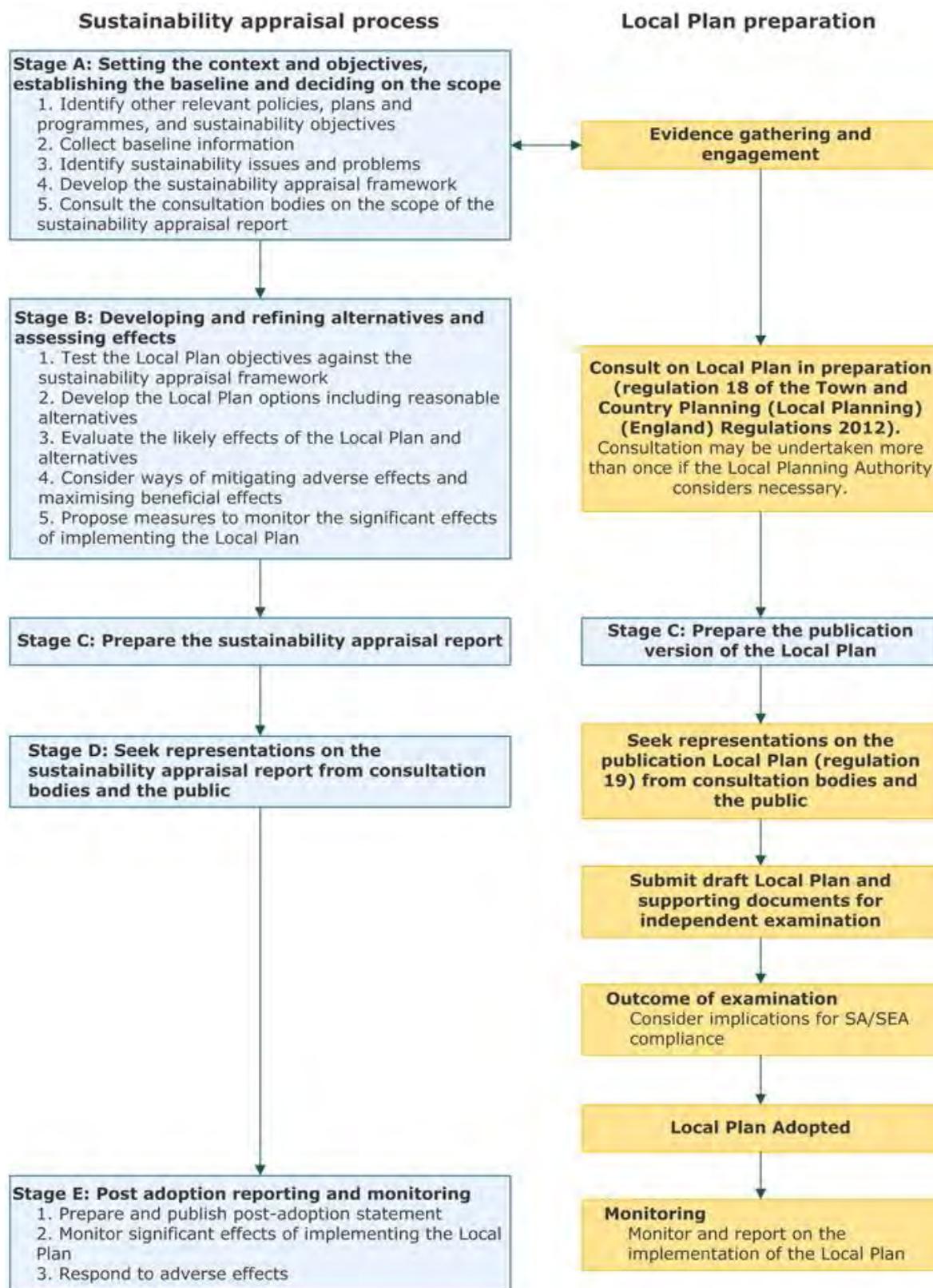


Figure 1.2: Sustainability Appraisal process as presented in national planning practice guidance¹⁴

¹⁴ Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>
 [Date accessed: 02/11/22]

1.6 The SA process so far

1.6.1 **Figure 1.2** illustrates the different stages of SA and outputs that are planned as part of the SA of the local plan up to the Publication Stage which is presently scheduled for 2024. The green boxes indicate the position of this current report in the sequence of stages that are taking place alongside plan production.

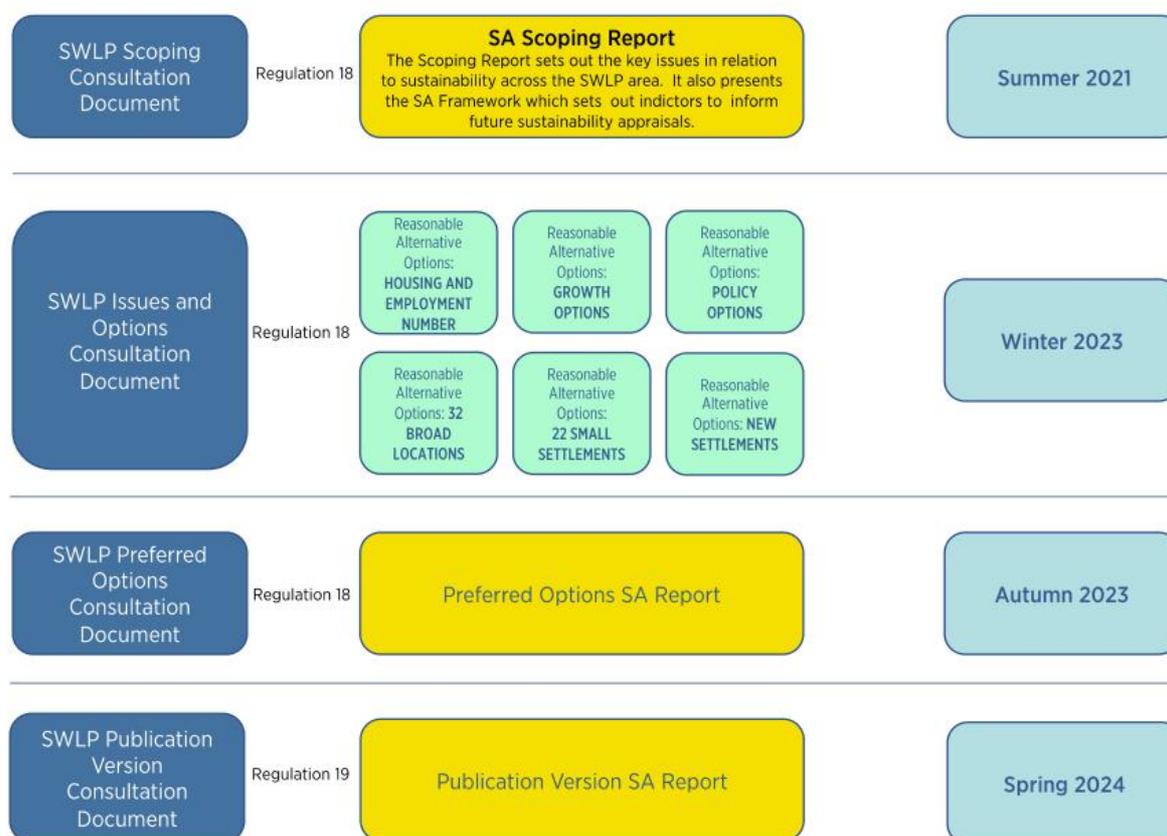


Figure 1.3: Sustainability Appraisal process embedded within the main stages of the SWLP plan making process

1.7 Scoping

1.7.1 The first stage of the process, scoping, was completed in June 2022. The scoping report specifies the scope and level of detail of the information to be included in the SA process. The SA Scoping Report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- The SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.7.2 The Scoping report was consulted on with the statutory bodies: Natural England, Historic England and the Environment Agency.

1.7.3 The Scoping Report¹⁵ contains baseline information and should therefore be read alongside this report.

1.8 Structure of this SA Report

1.8.1 This document forms **Volume 2** of the Regulation 18 Issues and Options SA, which comprises the Main SA Report.

1.8.2 This chapter provides background information to South Warwickshire and the accompanying SA and SEA work. The remainder of this report is structured as follows:

- **Chapter 2** – Topic specific methodologies and assumptions;
- **Chapter 3** – Identification of reasonable alternatives;
- **Chapter 4** – Evaluation of the Broad Locations at the Main Settlements
- **Chapter 5** – Evaluation of the Small Settlement Locations
- **Chapter 6** – Evaluation of the New Settlement Locations
- **Chapter 7** – Evaluation of the Spatial Growth Options
- **Chapter 8** – Evaluation of the Policy Options
- **Chapter 9** – Conclusions and next steps;

1.8.3 **Volume 1** of the SA comprises the Non-Technical Summary of the Regulation 18 Issues and Options SA.

1.8.4 **Volume 3** of the SA comprises the Appendices which set out the detailed assessments that have informed the SA, as follows:

- **Appendix A** – The full SA Framework;
- **Appendix B** –Assessment information concerning environmental receptors and impact sources at the Main Settlements, expressed as Broad Locations which represent sub-areas in close proximity to the Main Settlements;
- **Appendix C** –Assessment information concerning environmental receptors and impact sources at the Small Settlement Locations;
- **Appendix D** –Assessment information concerning environmental receptors and impact sources at the New Settlement Locations; and
- **Appendix E** –Assessment of the different policy options identified in the SWLP Issues and Options Consultation Document.

¹⁵ Lepus Consulting (2022) Sustainability Appraisal of the South Warwickshire Local Plan: SA Scoping Report, June, 2022.

2 Topic specific methodologies, impact scoring index and assumptions

2.1 Introduction

2.1.1 This chapter sets out the methodology which has been used to appraise the sustainability performance of the reasonable alternatives as identified at the Issues and Options stage of Local Plan preparation.

2.2 Using the SA Framework

2.2.1 The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of the following SA Objectives:

1. **Climate change:** Reduce the SWLP authorities' contribution towards the causes of climate change.
2. **Flood risk:** Plan for anticipated levels of climate change.
3. **Biodiversity and geodiversity:** Protect, enhance and manage biodiversity and geodiversity.
4. **Landscape:** Protect, enhance and manage the quality and character of landscapes and townscapes.
5. **Cultural heritage:** Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.
6. **Environmental Pollution:** Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.
7. **Natural resources:** Protect and conserve natural resources including soil, water and minerals.
8. **Waste:** Reduce waste generation and disposal and support sustainable management of waste.
9. **Housing:** Provide affordable, high quality and environmentally sound housing for all.
10. **Human Health:** Safeguard and improve community health, safety and wellbeing.
11. **Accessibility:** Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.
12. **Education:** Increase access to education and improve attainment to develop and maintain a skilled workforce.
13. **Economy:** Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.

- 2.2.2 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Annex 1(f)¹⁶ of the SEA Directive. Including the SEA topics in the SA Objectives helps ensure that all of the environmental criteria of the SEA Directive are represented. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.
- 2.2.3 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.
- 2.2.4 The receptors considered for each SA Objective have been determined with consideration of the environmental baseline set out in the Scoping Report. The topic-specific methodologies set out in **Tables 2.2 – 2.14** below summarise the nature and level of impact anticipated on the identified receptors.

Table 2.1: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Adverse Impact	The proposed option prevents the achievement of the SA Objective to some extent. Mitigation solutions are achievable, and or complex, with a relatively low level of intervention.	-
Major Adverse Impact	The proposed option prevents the achievement of the SA Objective to a significant extent. Mitigation solutions are likely to be complex, if at all possible. A high level of intervention is required.	--

2.3 Describing effects

2.3.1 The SEA process requires that the likely significance of effects is determined. It also necessitates that the characteristics of the effects are articulated in the reporting process and that reports make reference to, amongst other matters listed in Annex II of the SEA Directive (see **Box 1.1**):

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects; and
- the transboundary nature of the effects.

¹⁶ Annex 1(f) identifies: 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'.

Box 2.1: *Annex II of the SEA Directive*¹⁷

Criteria for determining the likely significance of effects (Article 3(5) of SEA Directive)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

2.3.2 The following topic methodologies (see **section 2.4 – 2.16**) refer to how different environmental and human receptors are likely to be affected by the reasonable alternatives. All locational reasonable alternatives concern residential development proposals; only the Spatial Growth Options consider employment locations as well as residential development.

2.3.3 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how each receptor should be considered in the appraisal process.

¹⁷ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 20/01/20]

2.4 Climate Change (SA Objective 1)

2.4.1 **Table 2.2** sets out the proposed methodology to appraise the reasonable alternatives options against SA Objective 1: Climate change.

Table 2.2: SA Objective 1: Climate change assessment methodology

Score	Likely impact on carbon emissions
--	Residential-led development which could potentially result in an increase in CO ₂ emissions by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in CO ₂ emissions by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in CO ₂ emissions.
+/-	Non-residential development where the carbon emissions produced as a result of the proposed development is uncertain or insufficient information is available.
+	Development proposals which include energy saving or renewable energy technologies. Development proposals which would reduce reliance on personal car use, encourage active travel or the use of public transport.

Notes

Figures calculated using UK local authority CO₂ emissions data¹⁸ and the number of people per dwelling¹⁹, such that proposals for the following housing numbers are expected to increase carbon emissions by 1% or more in comparison to the current estimates:

- Stratford on Avon DC – 625 dwellings;
- Warwick DC – 1,287 dwellings.

Proposals for the following housing numbers are expected to increase carbon emissions by 0.1% or more in comparison to current estimates:

- Stratford on Avon DC – 63 dwellings;
- Warwick DC – 129 dwellings.

2.4.2 The increase in GHG emissions caused by development proposals are associated with impacts of the construction phase, the occupation and operation of homes and businesses, energy and water consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.

2.4.3 The incorporation of green infrastructure within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the 'urban heat island' effect, reducing the effects of air pollution and providing more pleasant outdoor environments to encourage active travel²⁰.

2.4.4 However, it is assumed that development on previously undeveloped or greenfield land would result in an increase in GHG emissions due to the increase in the local population and the number of operating businesses and occupied homes.

¹⁸ Department for Business, Energy & Industrial Strategy (2020) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018> [Date accessed: 13/07/22]

¹⁹ People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

²⁰ TCPA (2007) The essential role of green infrastructure: eco-towns green infrastructure worksheet. Available at: <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=dd06b21d-6d41-4c4e-bec5-4f29a192f0c6> [Date accessed: 14/12/20]

- 2.4.5 One potential method to estimate GHG emissions would be based on per capita calculations, using the UK local authority emissions statistics which is published by the Government annually²¹, based on the average number of people per dwelling and the proposed number of dwellings for new development sites. See **Table 2.2** for per capita information in the two districts.
- 2.4.6 Large scale residential-led development of up to 2,000 homes at the BLs, and 6,000 homes at the New Settlements, is likely to increase GHG emissions in the Plan area by more than 1% and exacerbate climate change effects in the future. Development at all SSLs could deliver between 50 – 500 dwellings and could therefore increase carbon emissions in the Plan area by more than 0.1% and exacerbate climate change effects in the future.
- 2.4.7 The 1% principle is limited and only a coarse precautionary indicator.
- 2.4.8 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment of carbon emissions. Further detail on climate change in the Plan area will be available later in the plan making process. A climate change study is currently being undertaken in support of the SWLP Review. This will analyse in more detail the performance of growth options in relation to climate change. Specific carbon footprint data for the plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the plan.
- 2.4.9 The development of greenfield sites for housing has the potential to lead to local, long term significant adverse effects in the form of increased flooding, drought and storm events. Cumulative effects are possible at national and global scale.
- 2.4.10 Sites proposed for employment or non-residential end use may present further negative effects on climate change; however, this would be dependent on the site-specific proposals and the nature of development, which is unknown at the time of assessment. Conversely, where renewable energy generation is incorporated within development, or proposed employment development locations would reduce commuting distances, potential adverse impacts could be offset, to some extent.
- 2.4.11 In terms of mitigation potential, the locational reasonable alternatives at all scales have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions. Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.
- 2.4.12 At this stage of SWLP preparation, the Councils have identified a number of approaches which seek to mitigate greenhouse gas (GHG) emissions and adapt to the increased risks associated with climate change²². More information is required to fully understand the likely benefits of these policies. Where possible local plan polices should seek to:

²¹ DBEIS (2021) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019> [Date accessed: 17/08/22]

²² South Warwickshire Local Plan Stage 1: Scoping and Call for Sites (May 2021) Available at <https://www.southwarwickshire.org.uk/doc/210268/name/J25287%20South%20Warwickshire%20Local%20Plan%202021%20WEB.pdf> [Date accessed 30/06/22]

- Reduce and limit GHG emissions from domestic and industrial/commercial sources
- Promote energy generation/use from renewable or low-carbon sources
- Develop in sustainable proximity to public transport links
- Encourage active travel to local services and amenities
- Incorporate GI measures to reduce overheating in summer, such as publicly accessible green space and tree planting to support urban cooling
- Facilitate implementation of adaptive techniques in building design e.g. passive heating/cooling.

2.4.13 To be effective, policies should be accompanied by metrics which will enable the success of the policies to be measured in a transparent and effective manner. Work is well underway with this as part of the Low Carbon South Warwickshire 2030 initiative²³.

2.5 Flood Risk (SA Objective 2)

2.5.1 **Table 2.3** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 2: Flood risk.

Table 2.3: SA Objective 2: Flood risk assessment methodology

Scoring	Likely Impact- Fluvial Flooding
--	More than 50% of the BL coincides with Flood Zones 2 and/or 3.
-	Less than 50% and more than 10% of the BL coincides with Flood Zones 2 or 3.
0	Less than 10% of the BL coincides with Flood Zones 2 or 3.
+	Development proposals which are located wholly within Flood Zone 1 or which have less than 1% FZ1 or FZ2.

Notes

Based on the Environment Agency fluvial flood risk data²⁴, such that:

- Flood Zone 3: 1% - 3.3+% chance of flooding each year (with Flood Zone 3b classified as functional floodplain);
- Flood Zone 2: 0.1% - 1% chance of flooding each year; and
- Flood Zone 1: Less than 0.1% chance of flooding each year.

Scoring	Likely Impact- Surface Water Flooding
--	More than 50% of the BL coincides with areas at high risk of surface water flooding.
-	Less than 50% and more than 10% of the BL coincides with any areas at risk of surface water flooding.
0	Less than 10% of the BL coincides with areas at high risk of surface water flooding.
+	Development proposals which are not located in areas determined to be at risk of surface water flooding or which have less than 1% flood risk.

²³ https://www.warwickdc.gov.uk/info/20468/climate_change/1718/climate_change_action_programme/3 [Date accessed 30/09/22]

²⁴ Environment Agency (2013) Flood Map for Planning Risk. Available at: <https://flood-map-for-planning.service.gov.uk> [Date accessed: 14/07/22]

Notes

Based on the Environment Agency surface water flood risk data²⁵, such that:

- High risk: 3.3+% chance of flooding each year;
- Medium risk: between 1% - 3.3% chance of flooding each year; and
- Low risk: between 0.1% - 1% chance of flooding each year.

- 2.5.2 In terms of mitigation potential, the masterplanning intentions for the locational reasonable alternatives assume that a principle for 40% greenspace within the BL will be followed. Any flood risk areas present in the BL should be carefully planned and positioned to be in greenspace. This helps with SuDS provision.
- 2.5.3 The potential for negative impacts to occur as a result of the locational reasonable alternatives coinciding with Flood Zones 2 or 3 or surface water flood risk zones have been considered relative to the size of the strategic location, taking into account the potential for development to be located in Flood Zone 1.
- 2.5.4 It is assumed that development proposals will be in perpetuity and it is therefore likely that development would be subject to the impacts of flooding at some point in the future.
- 2.5.5 It is recognised that climate change may increase the risk of flooding in the future. However, it has not been possible to include any modelled data or floodplain mapping to this effect.
- 2.5.6 Plan makers should be aware that a location with 40% coincidence with FZ2 or 3 is likely to be high risk in the future; the SA scoring guide indicates that major impacts are only anticipated from 50% and above. Readers should note that the scoring system is only a guide designed to provide a mechanism for comparing locations and potential impacts at a strategic level. The plan making and SA process is iterative and it may be necessary to obtain more detail beyond this initial assessment phase.
- 2.5.7 Flood zones are defined by the Environment Agency as follows:
- Flood Zone 3: 1% or greater chance of flooding each year;
 - Flood Zone 2: Between 0.1% - 1% chance of flooding each year; and
 - Flood Zone 1: Less than 0.1% chance of flooding each year.
- 2.5.8 According to Environment Agency data²⁶, areas determined to be at high risk of surface water flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance.

²⁵ Environment Agency (2013) Risk of flooding from surface water. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8_986_eff63d.pdf [Date accessed: 16/07/20]

²⁶ Environment Agency (2013) Risk of flooding from surface water – understanding and using the map. Available at: <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map> [Date accessed: 17/08/22]

2.6 Biodiversity and Geodiversity (SA Objective 3)

2.6.1 **Table 2.4** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 3: Biodiversity and geodiversity.

Table 2.4: SA Objective 3: Biodiversity and geodiversity assessment methodology

Scoring	Likely Impact- Habitats site e.g. SAC, SPA or Ramsar site
--	Development proposal coincides with, or is located in close proximity to, a Habitats site or area of functionally linked land. Likelihood of direct, permanent, irreversible impacts.
-	Development proposal is located within a recognised zone of influence (ZOI) or similar spatial catchment relative to the Habitats site. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on Habitats sites.
+	Development proposals which could potentially enhance features within a Habitats site.

Notes

Data for Habitats sites available from Natural England²⁷.

Scoring	Likely Impact- Site of Special Scientific Interest
--	Development coincides with, or is located adjacent to, a SSSI. Likelihood of direct, permanent, irreversible impacts.
-	Within an Impact Risk Zone (IRZ) which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.
0	Development within an IRZ which does not indicate the proposed development needs to consult with Natural England.
+	Development proposals which would enhance a SSSI.

Notes

Data for SSSIs and IRZs are available from Natural England²⁸.

Scoring	Likely Impact- National Nature Reserve
--	Development coincides with an NNR. Likelihood of direct, permanent, irreversible impacts.
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on NNRs.
+	Development proposals which would enhance or create an NNR.

Notes

Data for NNRs available from Natural England²⁹.

Scoring	Likely Impact- Ancient Woodland
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²⁷ Natural England (2020) Natural England Open Data Geoportal. Available at: <https://naturalengland-defra.opendata.arcgis.com> [Date accessed: 16/07/20]

²⁸ Natural England (2022) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 28 May 2020. Available at: <https://naturalengland-defra.opendata.arcgis.com/datasets/sssi-impact-risk-zones-england> [Date accessed: 14/07/22]

²⁹ Natural England (2022) National Nature Reserves (England). Available at: <https://naturalengland-defra.opendata.arcgis.com/datasets/national-nature-reserves-england> [Date accessed: 14/07/22]

--	Development proposal coincides with an ancient woodland. Likelihood of direct, permanent, irreversible impacts.
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.
0	Development proposal would not be anticipated to impact ancient woodland.
+	Development proposals which would enhance ancient woodland.

Notes

Data for ancient woodlands available from Natural England³⁰.

Scoring	Likely Impact- Local Nature Reserve
--	Development proposal likely to result in significant adverse impacts on a local nature reserve, due to coincidence, such as likely substantial loss of the LNR. Likelihood of direct, permanent, irreversible impacts.
-	Development proposal could potentially result in adverse impacts on a LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on an LNR.
+	Development proposals which would enhance or create an LNR.

Notes

Data for LNRs available from Natural England³¹.

Scoring	Likely Impact- Local Wildlife Sites
--	Development proposal likely to result in significant adverse impacts on a local wildlife site, due to coincidence, such as likely substantial loss of the LWS. Likelihood of direct, permanent, irreversible impacts.
-	BL anticipated to result in adverse impacts on a local wildlife designation, due to being located in close proximity yet impacts can be avoided through greenspace principles for the BL. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a local wildlife designation.
+	Development proposals which would enhance or create local wildlife designations.

Notes

Data for LWSs provided by the SWLP authorities.

³⁰ Natural England (2022) Ancient Woodland (England). Available at: <https://naturalengland-defra.opendata.arcgis.com/datasets/ancient-woodland-england> [Date accessed: 14/07/22]

³¹ Natural England (2022) Local Nature Reserves (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/b1d690ac6dd54c15bdd2d341b686ecd7_0 [Date accessed: 14/07/22]

Scoring	Likely Impact- Geological Sites
--	Development proposal anticipated to result in adverse impacts on a Regionally Important Geological Site, due to proximity of potential development. Likelihood of direct or indirect impacts.
-	Development proposal anticipated to result in adverse impacts on a local geological site, due to location or proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on a geological site
+	Development proposal anticipated to enhance a geological site.

Notes

Data for geological sites provided by the SWLP authorities.

Scoring	Likely Impact- Priority Habitats
-	Development proposal coincides with a priority habitat.
0	Development proposal does not coincide with a priority habitat.
+	Development proposals which enhance or create a priority habitat.

Notes

Data for priority habitats available from Natural England³².

2.6.2 The biodiversity and geodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area. These ecological receptors are listed in **Table 2.4**.

2.6.3 Where a site is coincident with, adjacent to or located in close proximity of an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

³² Natural England (2021) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 13/07/22]

- 2.6.4 Habitats sites (formerly referred to as European sites) provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs), designated under European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), and Special Protection Areas (SPAs), classified under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive). Additionally, paragraph 176 of the NPPF requires that sites listed under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are to be given the same protection as fully designated Habitats sites.
- 2.6.5 The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a Habitats site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each Habitats site (its qualifying features) and pathways via which the Local Plan may have an impact.
- 2.6.6 A Habitats Regulations Assessment (HRA) has been prepared to inform the Issues and Options stage of the SWLP preparation process. This has identified a number of Habitats sites which may be affected by development set out in the SWLP. Pathways of impact identified include change to water quality, recreational effects and impacts upon areas of functionally linked land (watercourses used by migratory species of fish). As the HRA report has identified potential likely significant effects, the next stage in the HRA process will be an Appropriate Assessment.
- 2.6.7 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to SSSIs, SACs, SPAs and Ramsar sites. They define zones around each designated site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts³³. IRZs have been used to inform the SA process.
- 2.6.8 For the purposes of this assessment, impacts on priority habitats protected under the 2006 NERC Act³⁴ have been considered in the context of Natural England's publicly available Priority Habitat Inventory database³⁵. It is acknowledged this may not reflect current local site conditions in all instances.
- 2.6.9 It is assumed that development proposals located on previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. Proposals which result in the loss of greenfield land are expected to contribute towards a cumulative loss in vegetation cover. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, due to the loss of stepping-stones and corridors. This will restrict the ability of ecological receptors to adapt to the effects of climate change.

³³ Natural England (2022) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 31 July 2022. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones> [Date accessed: 17/08/22]

³⁴ Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date accessed: 17/08/22]

³⁵ Natural England (2022) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 17/08/22]

- 2.6.10 Protected species survey information has not been used to inform the SA since consistent information collected and assembled on a contemporary and equal basis has not been possible at the time of writing. It is a high level assessment and detail of this nature is more likely to be accessed through planning applications after the plan has been adopted.
- 2.6.11 It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.
- 2.6.12 It is anticipated that the Councils will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of priority species and priority habitats protected under the NERC Act and other protected species.
- 2.6.13 It is assumed that the loss of biodiversity assets, such as ancient woodland or an area of priority habitat, are permanent and irreversible effects. It is assumed that mature trees and hedgerows will be retained where possible.
- 2.6.14 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report. However, extended Phase 1 habitats surveys would be helpful later in the plan making process once preferred options have been identified.
- 2.6.15 In terms of mitigation potential, the masterplanning intentions for the New Settlements, Broad Locations and Small Settlement Locations assume that a principle for 40% greenspace within the BL will be followed. Any biodiversity receptors in the BL should be carefully planned and positioned to be in greenspace. This should help provide good scope for design solutions that deliver design led mitigation that can avoid and reduce impacts on biodiversity.
- 2.6.16 As per para 175 of the NPPF they should also consider how the feature in question will contribute to the local nature recovery network and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- 2.6.17 The spatial dataset for priority habitats does not include every possible habitat that might be present at a location. For example, it does not include hedgerows or veteran trees.

2.7 Landscape (SA Objective 4)

- 2.7.1 **Table 2.5** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 4: Landscape.

Table 2.5: SA Objective 4: Landscape assessment methodology

Score	Likely Impact- Cotswolds AONB (National Landscape)
--	Development is located within or proximate to the AONB; likely significant adverse impact on the character and special qualities of the AONB.
-	Development proposals which could potentially alter views experienced of or from the AONB and/or alter its setting.

Score	Likely Impact- Cotswolds AONB (National Landscape)
0	Development proposals are not located in close proximity to the AONB, or the nature of development is determined not to affect the character or setting of the AONB.
+	Development proposals which would increase the understanding and enjoyment of the special qualities of the Cotswolds AONB.

Notes

Data available from Natural England³⁶.

Further information and specific objectives for the AONB are available within the Cotswolds AONB Management Plan 2018-2023³⁷.

Scoring	Likely Impact- Landscape Characterisation Assessment
-	Development proposals which could potentially be discordant with the character areas, guidelines and characteristics as set out in the 1993 Warwickshire Landscape Guidelines.
0	Development proposals unlikely to be discordant with the character areas, guidelines and characteristics as set out in the 1993 Warwickshire Landscape Guidelines.
+	Development proposals which would protect or enhance features identified in the 1993 Warwickshire Landscape Guidelines.

Notes

Warwickshire Landscape Guidelines 1993 and National Character Area profiles.³⁸

Scoring	Likely Impact- Landscape Sensitivity (SoADC only)
--	Development coincides substantially with areas of 'high' or 'high-medium' sensitivity as identified in the SoADC Landscape Sensitivity Analysis.
-	Development coincides with less than 50% high or high-medium sensitivity, and includes areas of 'medium' or 'medium-low' sensitivity as identified in the Landscape Sensitivity Analysis.
0	Development proposals located within areas of 'low' sensitivity as identified in the Landscape Sensitivity Analysis.
+	Development proposals which would protect or enhance features of the landscape as identified within the Landscape Sensitivity Analysis.

³⁶ Natural England (2020) Areas of Outstanding Natural Beauty (England). Available at: <https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england> [Date accessed: 13/07/22]

³⁷ Cotswolds Conservation Board (2018) Cotswolds AONB Management Plan 2018-2023. Available at: <http://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/> [Date accessed: 16/07/22]

³⁸ Natural England (2014) National Character Area Profiles. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles> [Date accessed: 14/07/22]

Notes

Landscape Sensitivity Assessment of Local Service Villages³⁹
 Landscape Sensitivity Assessment of Main Settlements including Areas of Restraint Assessment⁴⁰
 Landscape Sensitivity, Ecological and Geological Study⁴¹
 Area of restraint designations in the Stratford Core Strategy

Scoring Likely Impact- Special Landscape Areas

--	Development proposals located inside the SLA which directly affect the majority of the SLA.
-	Development proposals located inside of very close to the SLA which directly affect part of the SLA not greater than 50%.
0	Development proposals not located anywhere close to an SLA e.g. beyond the visual envelope of the SLA.
+	Development proposals which would protect or enhance features of the SLA.

Notes

Special Landscape Areas are defined in the 2016 Stratford Core Strategy. Special Landscape Areas are a Stratford designation only.

Scoring Likely Impact- Country Park

--	Development proposals located inside the CP which directly affect the majority of the CP.
-	Development proposals located in close proximity CP which directly affect the landscape qualities of the CP.
0	Development proposals not located anywhere close to a CP e.g. beyond the visual envelope of the CP.
+	Development proposals which would protect or enhance features of the CP.

Notes

PRoW data provided by the SWLP authorities.
 Views have been identified through the use of aerial photography and Google Maps.

³⁹ White Consultants (2012) 'Landscape Sensitivity Assessment of Local Service Villages' Available at <https://www.stratford.gov.uk/planning-building/landscape-and-green-infrastructure.cfm> [Date accessed 14/07/22]

⁴⁰ White Consultants (2011) 'Landscape Sensitivity Assessment of Main Settlements including Areas of Restraint Assessment' Available at <https://www.stratford.gov.uk/planning-building/landscape-and-green-infrastructure.cfm> [Date accessed 14/07/22]

⁴¹ WCC (2013) Landscape Sensitivity, Ecological and Geomorphological Study' Available at https://www.warwickdc.gov.uk/downloads/file/1549/appendix_7_-_landscape_sensitivity_and_ecological_and_geological_study [Date accessed 14/07/22]

Scoring	Likely Impact- Views from the PRoW Network
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRoW network.
0	Development proposals are not considered to significantly alter views experienced by users of the PRoW network.
+	Development proposals which could potentially improve the views experienced from the nearby PRoW network.

Notes

PRoW data provided by the SWLP authorities.

Views have been identified through the use of aerial photography and Google Maps.

Scoring	Likely Impact- Coalescence
-	Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements.
0	Development proposals are not considered to significantly reduce the separation between existing settlements and increase the risk of the coalescence of settlements.

Notes

Potential impacts determined through use of aerial photography and Google Maps.

- 2.7.2 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.
- 2.7.3 All datasets that have been used to inform the SA are presented in **Table 2.5**. There is no consideration of the Green Belt designation as part of the SA process as the Councils have taken a 'policy-off' approach and recognize that the SA process strategically evaluates the effects of development at greenfield locations by looking at a much wider range of variables than the purposes of Green Belt designation.
- 2.7.4 In order to consider potential visual effects of development, it has been assumed that the development proposals would, broadly, reflect the character of nearby development of the same type. Potential views from residential properties are identified using aerial photography.
- 2.7.5 It is anticipated that the Councils will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) or Landscape and Visual Appraisals (LVAs) to accompany any future proposals, where relevant. The LVIAs or LVAs should seek to provide greater detail in relation to the landscape character of the proposal and its surroundings, the views available towards the development proposal, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

- 2.7.6 Large scale residential-led development is likely to impact the countryside and urban edge environs where the various reasonable alternative development locations are located. All BLs are likely to lead to some form of landscape impact depending on the nature of the receptor as some are more sensitive than others.
- 2.7.7 In terms of mitigation potential, the masterplanning intentions for the New Settlement Locations, Broad Locations and Small Settlement Locations assume that a principle for 40% greenspace within the BL will be followed. This should help provide good scope for design solutions that deliver design led mitigation that can avoid and reduce impacts on changing character and views.
- 2.7.8 It is recognised and recommended that landscape sensitivity and capacity studies would be helpful later in the plan making process once preferred options have been identified.

2.8 Cultural Heritage (SA Objective 5)

- 2.8.1 **Table 2.6** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 5: Cultural heritage.

Table 2.6: SA Objective 5: Cultural heritage assessment methodology

Scoring	Likely Impact- Grade II* Listed Buildings
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.
-	Development proposal located within the wider setting of a Grade I Listed Building.
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
+	Development proposals which could potentially enhance a Grade I Listed Building or its setting.

Notes

Grade I Listed Buildings are considered to be those of exceptional interest.

Data for heritage assets⁴², including the Heritage at Risk Register⁴³, available from Historic England.

Scoring	Likely Impact- Grade II* Listed Buildings
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.
-	Development proposal located within the setting of a Grade II* Listed Building.
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
+	Development proposals which could potentially enhance a Grade II* Listed Building or its setting.

Notes

Grade II* Listed Buildings are considered to be those of more than special interest.

Data sourced from Historic England as above.

⁴² Historic England (2022) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 13/07/22]

⁴³ Historic England (2022) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date accessed: 13/07/22]

Scoring	Likely Impact- Grade II Listed Buildings
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II Listed Building.
-	Development proposal located within the setting of a Grade II Listed Building.
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.
+	Development proposals which could potentially enhance a Grade II Listed Building or its setting.

Notes

Grade II Listed Buildings are considered to be those of special interest.
 Data sourced from Historic England as above.

Scoring	Likely Impact- Scheduled Monuments
--	Development proposal coincides with a SM.
-	Development proposal located within the setting of a SM.
0	Development proposal not considered to impact a SM or its setting.
+	Development proposals which could potentially enhance a Scheduled Monument or its setting.

Notes

Scheduling is the selection of a sample of nationally important archaeological sites.
 Data sourced from Historic England as above.

Scoring	Likely Impact- Registered Parks and Gardens & Registered Battlefields
--	Development proposal coincides with an RPG or Registered Battlefield or substantially alters setting of the feature.
-	Development proposal located within the setting of an RPG or Registered Battlefield.
0	Development proposal not considered likely to impact an RPG / RB or its setting.
+	Development proposals which could potentially enhance an RPG / RB or its setting.

Notes

The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection.
 Data sourced from Historic England as above.

Scoring	Likely Impact- Conservation Areas
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.
0	Development proposal not considered to impact a Conservation Area or its setting.
+	Development proposals which could potentially enhance a Conservation Area.

Notes

Conservation Area data provided by the SWLP authorities.

Scoring **Likely Impact- Local Archaeological Record Site**

-	Development proposal coincides with an archaeological site.
0	Development proposal does not coincide with an archaeological site.
+	Development proposals which could potentially enhance an archaeological site.

Notes

No data available – Jo’s Heritage Report for ESCC will be helpful.

- 2.8.2 A Heritage and Settlement Sensitivity Assessment has been undertaken for the plan area which will provide specialist evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of reasonable alternatives at this stage of the SA process.
- 2.8.3 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. At this stage, the risk of substantial harm to the significance of a heritage asset has been assessed based on the nature and significance of, and proximity to, the heritage asset in question.
- 2.8.4 Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG) and Conservation Areas.
- 2.8.5 It is assumed that where a designated heritage asset coincides with a development proposal, the designated heritage asset will not be lost as a result of development (unless otherwise specified by the Councils). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible.
- 2.8.6 Development proposals which would be discordant with the local character or setting, for example due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset.
- 2.8.7 Heritage features identified on Historic England's Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment⁴⁴. Where Heritage at Risk assets could potentially be affected by the proposed development, this has been stated.

⁴⁴ Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date accessed: 16/08/22]

- 2.8.8 It is anticipated that the Councils will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.
- 2.8.9 All SA findings have been informed by desktop analysis using the datasets listed in **Table 2.6**. It is recognised and recommended that evaluation of historic environment features at preferred options stage of the plan making would be helpful.
- 2.8.10 All assessments of different strategic reasonable alternative development options have included an assumption that development will include 40% greenspace as part of any development allocation. Any heritage receptors in the development location should be carefully planned and positioned to be in greenspace. This should help provide good scope for design solutions that deliver design led mitigation that can avoid and reduce impacts on heritage.

2.9 Environmental Pollution (SA Objective 6)

- 2.9.1 **Table 2.7** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 6: Environmental Pollution.

Table 2.7: SA Objective 6: Environmental pollution assessment methodology

Scoring	Likely Impact : AQMA
-	Development proposal coincides or is located within 200m of an AQMA.
0	Development proposal is located over 200m from an AQMA.

Notes

UK AQMA data available from Defra⁴⁵.

A 200m buffer distance from AQMAs has been used, in line with the DfT guidance⁴⁶.

Scoring	Likely Impact : Main Roads
-	Development proposal is located within 200m of a main road.
0	Development proposal is located over 200m from a main road.
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.

⁴⁵ Department for Environment Food and Rural Affairs (2022) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 13/07/22]

⁴⁶ Department for Transport (2022) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 13/07/22]

Notes

Road data available from the Ordnance Survey⁴⁷.

A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the DfT guidance⁴⁸.

Scoring	Likely Impact : Railway Line
-	Development proposals located within 200m of a Railway Line.
0	Development proposals located over 200m from a Railway Line.
+	Development proposals which would help to reduce the pressure on railway lines, by promoting the use of other public transport and active travel.

Notes

Road data available from the Ordnance Survey⁴⁹.

A precautionary 200m buffer distance from railway lines has been used.

Scoring	Likely Impact : Water quality/ Watercourses
-	Development proposals located within 200m of a watercourse.
0	Development proposals located over 200m from a watercourse.
+	Development proposal includes integration of green infrastructure or the naturalization of watercourses.

Notes

Watercourse mapping data available from the Ordnance Survey⁵⁰.

Scoring	Likely Impact : Groundwater Source Protection Zone (SPZ)
-	Development proposal coincides with a groundwater SPZ.
0	Development proposal does not coincide with a groundwater SPZ.

⁴⁷ Ordnance Survey (2022) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 13/07/20]

⁴⁸ Department for Transport (2022) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 13/07/22]

⁴⁹ Ordnance Survey (2022) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 13/07/20]

⁵⁰ Ordnance Survey (2020) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 13/07/22]

Notes

SPZ data available from the Environment Agency⁵¹. Groundwater source catchments are divided into three zones⁵²:

- Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;
- Outer Zone (Zone II) – 400-day travel time; and
- Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.

- 2.9.2 It is assumed that development proposals would result in an increase in traffic and thus traffic-related air pollution. Both existing and future site end users would be exposed to this change in air quality. At this stage of assessment, residential capacity at each site is unknown, and as such, it is uncertain the extent to which each development proposal could potentially increase air pollution in the local area.
- 2.9.3 Exposure of new residents to air pollution has been considered in the context of the proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *“beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant”*⁵³. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{54 55}. A buffer distance of 200m has therefore been applied in this assessment. A proposed site which lies wholly or partially within an AQMA or a 200m buffer, as described above, is assessed as having potential negative effects on new residents.
- 2.9.4 The proximity of a proposal in relation to a main road determines the exposure level of site end users to road related air and noise emissions⁵⁶. In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road. This distance has therefore been applied throughout this assessment to both existing road and rail sources. A proposed site which lies wholly or partially within a 200m buffer, as described above, is assessed as having potential negative effects on new residents.

⁵¹ Environment Agency (2022) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 13/07/22]

⁵² Environment Agency (2019) Groundwater source protection zones. Available at: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs> [Date accessed: 13/07/22]

⁵³ Department for Transport (2017) TAG unit A3 Environmental Impact Appraisal. Available at: <https://www.gov.uk/government/publications/webtag-tag-unit-a3-environmental-impact-appraisal-december-2015> [Date accessed: 16/08/22]

⁵⁴ Bignal, K., Ashmore, M & Power, S. 2004. The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁵⁵ Ricardo-AEA, 2016. The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

⁵⁶ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/section3/ha20707.pdf> [Date accessed: 16/08/22]

- 2.9.5 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater sources⁵⁷.
- 2.9.6 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water⁵⁸. In this assessment, a 200m buffer zone was deemed appropriate. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted⁵⁹.
- 2.9.7 The assessment of impacts associated with development upon watercourse focuses on surface water run-off only. It is acknowledged that all development set out in the SWLP will in-combination increase the volume of water for treatment at Waste Water Treatment Works (WwTWs). This has the potential to lead to a deterioration in water quality if the correct infrastructure is not put in place. Under the WFD, the quality of water within a watercourse must not deteriorate from its current WFD classification (either as an overall watercourse or for individual elements assessed). In addition, given the potential for Functionally Linked Land to be present within the SWLP area, development must not undermine the ability of watercourses to meet Good Ecological Status. This will be secured through WwTW upgrades where necessary by the relevant water company to meet the scale of development set out in the SWLP, combined with strong SWLP policy wording in respect of water quality and water efficiency. It may also be necessary for developers to consider providing additional measures to protect water quality, on a voluntary basis. In addition, opportunities to implement natural flood management techniques to achieve multiple benefits in respect of flood risk, water quality and habitat creation could be explored.
- 2.9.8 The pollution indicators include receptors and sources of pollution that might affect future levels of environmental pollution. The distances are estimates to assist with the aim of flagging up issues for consideration in more detail later in the plan making process.
- 2.9.9 In terms of mitigation potential, it is assumed that all locational reasonable alternatives will have 40% greenspace within each option. This should help provide good scope for design solutions that deliver design led mitigation that can avoid and reduce exacerbating pollution risk.
- 2.9.10 Residential-led development is likely to result in an increase in air pollution, to some extent, for example through increased local traffic. Large scale and medium scale options (6,000 and 2,000 homes respectively) could potentially result in a significant increase in local air pollution. Small scale options for between 50 – 500 dwellings could also potentially increase local air pollution. Air quality pollution could also lead to cumulative effects.

⁵⁷ Environment Agency (2019) Groundwater source protection zones (SPZs). Available at: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs> [Date accessed: 17/08/22]

⁵⁸ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: https://www.who.int/water_sanitation_health/resourcesquality/wqmchap2.pdf [Date accessed: 15/11/19]

⁵⁹ Department for Environment Food and Rural Affairs (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 17/08/22]

2.9.11 In terms of mitigation potential, the locational reasonable alternatives have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies are likely to require more detailed assessments of impacts on air pollution from development proposals. Design measures could include green infrastructure solutions as well as clean energy initiatives including electric cars. These measures are unlikely to reduce the impact to negligible in the short term.

2.10 Natural Resources (SA Objective 7)

2.10.1 **Table 2.8** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 7: Natural resources.

Table 2.8: SA Objective 7: Natural resources assessment methodology

Scoring	Likely Impact : Agricultural Land Classification
--	Development proposal includes an area of land over 20ha of Grade 1, 2 or 3 ALC land. Permanent and irreversible effects are likely.
-	Development proposal includes an area of land less than 20ha of Grade 1, 2 or 3 ALC land. Permanent and irreversible effects are likely.
0	Development proposals which are situated on poor quality agricultural land: Grade 4 and 5 ALC land.
+	Development proposals which are situated on land classified as 'urban' or 'non-agricultural'.

Notes

ALC data available from Natural England⁶⁰. Where Grade 3 data is not sub-divided into 3a or 3b, it is assumed that 3a is present.

A 20ha threshold for BMV land has been used based on Natural England guidance⁶¹.

Development proposals which are situated on previously developed land will not be assessed under ALC.

Scoring	Likely Impact : Mineral Safeguarding Areas
-	Development proposal coincides with an MSA.
0	Development proposal does not coincide with an MSA.
+	Development proposals for the extraction of mineral resources.

Notes

Data provided by SWLP authorities.

2.10.2 In accordance with the core planning principles of the NPPF⁶², development on previously developed land will be recognised as an efficient use of land.

⁶⁰ Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094 [Date accessed: 13/07/22]

⁶¹ Natural England (2019) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 13/07/22]

⁶² Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 16/08/22]

- 2.10.3 Development proposals on previously undeveloped land are expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.
- 2.10.4 In addition, proposals which would result in the loss of greenfield land would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land has therefore been considered to have an adverse effect. See also SA Objective 3: Biodiversity and Geodiversity.
- 2.10.5 The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and Subgrade 3a, are referred to as the 'best and most versatile' (BMV) land⁶³. Where site-specific ALC studies have not been completed, it is not possible to identify Subgrade 3a and 3b land. Therefore, a precautionary approach is taken, and potential BMV land is assessed as Grades 1, 2 and 3.
- 2.10.6 Adverse impacts are expected for options which would result in a net loss of agriculturally valuable soils or which lead to the sterilisation of valuable mineral deposits, as identified through the designation of Mineral Safeguarding Areas.
- 2.11 **Waste (SA Objective 8)**
- 2.11.1 **Table 2.9** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 8: Waste.

Table 2.9: SA Objective 8: Waste assessment methodology

Scoring	Likely Impact : Waste
--	Residential-led development which could potentially result in an increase in household waste generation by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in household waste generation by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in household waste generation.
+/-	The waste generated as a result of development proposals for non-residential use is uncertain or insufficient information is available.
+	Development proposals include provision of waste and recycling storage.
++	Development proposals are for waste or recycling facilities.

⁶³ MAFF. October 1988. Available at Natural England.
<http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 16/08/22]

Notes

Figures calculated using UK local authority waste data⁶⁴ and the number of people per dwelling⁶⁵, such that proposals for the following housing numbers are expected to increase household waste generation by 1% or more in comparison to the current estimates:

- Stratford-on-Avon – 750 dwellings; and
- Warwick – 675 dwellings.

Proposals for the following housing numbers are expected to increase household waste generation by 0.1% or more in comparison to current estimates:

- Stratford-on-Avon – 75 dwellings; and
- Warwick – 68 dwellings

- 2.11.2 One potential method to estimate household waste production would be based on per capita calculations, using the UK local authority statistics which is published by the Government annually⁶⁶, based on the average number of people per dwelling and the proposed number of dwellings for new development sites. See **Table 2.9**.
- 2.11.3 Large and medium scale residential-led development is likely to increase waste. Any of the BLs could deliver up to 2,000 dwellings and could increase waste in the Plan area by more than 1%. The SSLs could deliver approximately 50 – 500 dwellings and could therefore also increase waste in the Plan area by 1%. The 1% principle is limited and only a coarse precautionary indicator. It applies to all BLs and SSLs and is only a guideline. All sites perform in the same way and will lead to significant increases in waste.
- 2.11.4 In terms of mitigation potential, the locational reasonable alternatives have been identified with the intention of supporting 20-minute neighbourhoods with the aim of reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.
- 2.11.5 Waste policies are complex as they relate, in part, to behavioural solutions. The Warwickshire Waste Plan is the mechanism for managing and reducing waste and can include policies which will seek to:
- Minimise household waste generation;
 - Minimise industrial/commercial waste generation including construction; and
 - Maximise rates of recycling and composting.
- 2.11.6 To be effective, policies should be accompanied by metrics which will enable to success of the policies to be measured in a transparent and effective manner. All sites perform in the same way and will lead to significant increases in waste.

⁶⁴ Department for Environment, Food and Rural Affairs (2022) Local Authority Collected Waste Statistics. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date accessed: 16/07/20]

⁶⁵ People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

⁶⁶ Department for Environment Food and rural Affairs (2021) Statistics on waste managed by local authorities in England in 2020/21. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040756/Statistics_on_waste_managed_by_local_authorities_in_England_in_2020_v2rev_accessible.pdf [Date accessed: 17/08/22]

2.12 Housing (SA Objective 9)

2.12.1 **Table 2.10** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 9: Housing.

Table 2.10: SA Objective 9: Housing assessment methodology

Scoring	Likely Impact : Provision of Housing
--	Development proposal will result in a significant net decrease in housing (of 10 dwellings or more).
-	Development proposal will result in a minor net decrease in housing (of between one and 9 dwellings).
0	Development proposals would not impact housing provision.
+/-	It is uncertain whether the proposed development would result in a net change in housing provision or insufficient information is available.
+	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).
++	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).

Notes

Need to explain the 20 settlements per hectare assumption we have used – should it be here or in the explanations elsewhere?

- 2.12.2 The Councils have prepared evidence documents in relation to the housing needs in South Warwickshire over the Plan period. Development proposals are assessed for the extent to which they will help to meet the diverse needs of current and future residents of the Plan area.
- 2.12.3 Under this objective, development proposals which would result in an increase of 99 dwellings or less would usually be assessed as having a minor positive impact on the local housing provision. Development proposals which would result in an increase of 100 dwellings or more would be likely to have a major positive impact on the local housing provision.
- 2.12.4 The provision of high quality affordable housing, alongside appropriate facilities, is important to the creation of sustainable communities in relation to health and wellbeing impacts and the opportunity to have good quality, affordable accommodation. Lack of affordable accommodation, can lead to those people in lower skilled jobs living further from their places of employment and therefore lead to greater levels of commuting and travel. At this stage of plan-making, it is assumed that all residential-led development options will help provide affordable, high quality housing that meets the range of accommodation needs identified for the community, including affordable, student and specialist housing as well as self and custom build housing.

2.13 Health (SA Objective 10)

2.13.1 **Table 2.11** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 10: Health.

Table 2.11: SA Objective 10: Health assessment methodology

Scoring	Likely Impact : NHS Hospital with A&E Department
-	Development proposal is located over 5km from an NHS hospital providing an A&E service.
+	Part of the development proposal is located within 5km from an NHS hospital providing an A&E service.
++	The majority of the development proposal is coincident with the 5km from an NHS hospital providing an A&E service.

Notes

NHS hospital department data available from the NHS website⁶⁷.

Target distance of 5km to an NHS hospital with and A&E service in line with Barton et al. sustainable distances⁶⁸.

Scoring	Likely Impact : Access to GP Surgery
-	The development proposal is located over 800m from a GP surgery.
+	Part of the development proposal is coincident with an GP 800m zone.
++	The majority of the development proposal is coincident with a GP surgery.

Notes

Target distance of 800m to a GP surgery in line with Barton et al. sustainable distances.

Scoring	Likely Impact : Access to Leisure Facilities
-	Development proposal is located over 1500m from a Leisure Facility.
+	Development proposal is located partially within the target distance of 1500m from a Leisure Facility.
++	The majority of the BL is located within the target distance of 1500m from a Leisure Facility.

Notes

Target distance of 1.5km to a leisure facility in line with Barton et al. sustainable distances.

Leisure facilities include council owned leisure centres and other sports facilities which are open to the public.

Scoring	Likely Impact : AQMA
-	Development proposal coincides with or is located within 200m of an AQMA.
0	Development proposal is located over 200m from an AQMA.

⁶⁷ NHS (2022) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date accessed: 14/07/22]

⁶⁸ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Notes

UK AQMA data available from Defra⁶⁹.

A 200m buffer distance from AQMAs has been used, in line with the DfT guidance⁷⁰.

Scoring **Likely Impact : Main Roads**

- Development proposal is located within 200m of a main road.

0 Development proposal is located over 200m from a main road.

Notes

Road data available from the Ordnance Survey⁷¹.

A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance⁷².

Scoring **Likely Impact : Access to Greenspace**

- Development proposal is located over 800m from a public greenspace, local green space.

+ Development proposal is partially located within 800m of a public greenspace, local green space.

++ The majority of the development proposal is within 800m of a public greenspace, local green space.

Notes

Data for Country Parks available from Natural England⁷³. Data for public greenspaces available from Ordnance Survey⁷⁴.

Target distance of 800m to a public greenspace in line with SWLP authorities' methodology for '20-minute neighbourhoods'.

Scoring **Likely Impact : Provision of Housing**

- Development proposal is located over 600m from a PRoW / Cycle Path.

+ Development proposal is located within 600m of a PRoW / Cycle Path.

⁶⁹ Department for Environment Food and Rural Affairs (2022) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 14/07/22]

⁷⁰ Department for Transport (2022) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 14/07/22]

⁷¹ Ordnance Survey (2022) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 14/07/22]

⁷² Department for Transport (2022) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 14/07/22]

⁷³ Natural England (2018) Country Parks (England). Available at: <https://naturalengland-defra.opendata.arcgis.com/datasets/country-parks-england> [Date accessed: 16/07/20]

⁷⁴ Ordnance Survey (2018) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 16/07/20]

- 2.13.2 It is assumed that development proposals located in close proximity to main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road⁷⁵. Negative impacts on the long-term health of residents is anticipated where residents will be exposed to air pollution.
- 2.13.3 AQMAs are considered to be an area where the national air quality objective will not be met. Site end users exposed to poor air quality associated with AQMAs would be expected to have adverse impacts on health and wellbeing.
- 2.13.4 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the SWLP should seek to ensure that residents have access to NHS hospitals, GP surgeries and leisure centres. Sustainable distances to each of these necessary services are derived from Barton *et al.*⁷⁶.
- 2.13.5 For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of proposals to other NHS facilities (e.g. community hospitals and treatment centres i.e. Warwick University Health Centre) or private hospitals has not been taken into consideration in this assessment.
- 2.13.6 Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise. New development proposals have been assessed in terms of their access to the local PRoW networks and greenspace. In line with Barton *et al.*⁷⁷, a sustainable distance of 600m has been used for the assessments.
- 2.13.7 All assessments of different strategic reasonable alternative development options have included an assumption that development will include 40% greenspace as part of any development allocation.

2.14 Accessibility (SA Objective 11)

- 2.14.1 **Table 3.12** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 12: Transport.

Table 2.12: SA Objective 11: Accessibility assessment methodology

Scoring	Likely Impact : Bus Stop
-	Development proposals are located over 400m from a bus stop or within 400m of a bus stop with irregular services.
+	Development proposals are partially located within 400m of a bus stop providing regular services.
++	The majority of the development proposal is within 400m of a bus stop providing regular services.

⁷⁵ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf> [Date accessed: 17/08/22]

⁷⁶ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

⁷⁷ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010-

Notes

Bus stop data available from SWLP authorities.
 Target distance of 400m to a bus stop in line with Barton et al. sustainable distances⁷⁸.

Scoring	Likely Impact : Railway Station
-	Development proposal is located over 2km from a national network railway station.
+	Development proposal is partially located within 2km of a national network railway station.
++	The majority of the development proposal is within 2km of a national network railway station.

Notes

National network railway station data available from SWLP authorities.
 Target distance of 2km to a railway station in line with Barton et al. sustainable distances.

Scoring	Likely Impact : Food Stores
-	Development proposal is located over 800m from a food store.
+	Development proposal is located within 800m of a food store.

Notes

Food store locations are data available from google maps. The assessment includes local food stores and supermarkets.
 Target distance of 800m to a food store in line with SWLP authorities' methodology for '20-minute neighborhoods', seeking to reduce the need for daily trips by private car.

Scoring	Likely Impact : Connectivity
--	Development proposal is located in an area identified to have very poor connectivity (Grade E)
-	Development proposal is located in an area identified to have poor connectivity (Grade D)
0	Development proposal is located in an area identified to have moderate connectivity (Grade C)
+	Development proposal is located in an area identified to have good connectivity (Grade B)
++	Development proposal is located in an area identified to have excellent connectivity (Grade A)

⁷⁸ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Notes

Methodology in line with the SWLP authorities' connectivity work in the 'South Warwickshire Settlement Analysis'⁷⁹, which assesses presence of active travel and existing road network links, and any 'barriers', in relation to the locations.

Note: data was not available for some Broad Locations and one Small Settlement.

We are assessing by the lowest level of connectivity in the Small Settlement.

Unless that area is very small so the impact would be negligible.

- 2.14.2 The Councils' settlement analysis project explored connectivity and accessibility:
- 1) Connectivity – the physical connectivity of the existing street pattern, and any physical barriers which limit route/connection options. This has implications for the legibility of places, character of the place, the activity and perceived safety along some routes, though these are not explicitly addressed by this study.
 - 2) Accessibility – this element largely focusses on proximity/distance to key facilities, services, as distance is a key factor in modal choice.
- 2.14.3 The Councils evaluated a range of settlement locations based on how they matched the spatial characteristics of the seven growth options originally identified in the 2021 SWLP Issues and Option Scoping Consultation document. The findings have been used to evaluate connectivity.
- 2.14.4 In line with Barton *et al.*'s sustainable distances, site end users should be situated within 2km of a railway station and 400m of a bus stop offering a frequent service. Consideration has been given to the proportion of a development proposal within the target distance of these transport options.
- 2.14.5 Bus service frequency and destination information has been obtained from Google Maps^{80,81}. To be sustainable, the bus stop should provide users with hourly services.
- 2.14.6 Development proposals have been assessed in terms of their access to the surrounding footpath network. Access should be safe, where site end users would not have to cross roads where there are no pedestrian crossings.
- 2.14.7 Development proposals have been assessed in terms of their existing access to the surrounding road network. Where a development proposal is currently not directly linked to the road network, it is assumed that road infrastructure will need to be incorporated into the proposed development.

2.15 Education (SA Objective 12)

2.15.1 **Table 2.13** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 13: Education.

Table 2.13: SA Objective 12: Education assessment methodology

Scoring	Likely Impact : Primary School
-	Residential development proposal is located over 800m from a primary school.

⁷⁹ South Warwickshire Councils (2022) 'South Warwickshire Settlement Analysis'

⁸⁰ Google Maps (no date) Available at: <https://www.google.co.uk/maps>

⁸¹ Live departure boards available from Google Maps have been used to assess the frequency of services at bus stops within the Plan area. These are obtained from local bus timetables.

0	Development proposal is located for non-residential use.
+	Residential development proposals are located within 800m of a primary school.

Notes

Primary school data provided by the SWLP authorities.
 Target distance of 800m to a primary school in line with Barton et al. sustainable distances⁸².

Scoring	Likely Impact : Secondary School
-	Residential development proposal is located over 1.5km from a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals are located within 1.5km of a secondary school.

Notes

Secondary school data provided by the SWLP authorities.
 Target distance of 1.5km to a secondary school in line with Barton et al. sustainable distances.

Scoring	Likely Impact : Further Education
+	Residential development proposals are located within 5km of a further education facility providing education for 16-18-year old, including 'Sixth Forms' and Colleges.

Notes

Further education data provided by the SWLP authorities.
 Target distance of 5km to further education in line with Barton et al. sustainable distances.

- 2.15.2 It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents.
- 2.15.3 In line with Barton *et al.*'s sustainable distances⁸³, for the purpose of this assessment, 800m is assumed to be the target distance for travelling to a primary school and 1.5km to a secondary school. All schools identified are publicly accessible state schools.
- 2.15.4 The law requires all young people in England to continue in education or training until at least their 18th birthday, even if they work. The assessment of tertiary, or further, education considers access to educational institutions which offer post-secondary school educational opportunities. This category can include 'Six Forms' and colleges. Access to tertiary educational institutions has been assessed using a 5km search zone.
- 2.15.5 Access to universities has not been considered at this stage.

⁸² Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

⁸³ Ibid.

2.16 Economy (SA Objective 13)

2.16.1 **Table 2.14** sets out the proposed methodology to appraise the reasonable alternatives against SA Objective 14: Economy.

Table 2.14: SA Objective 13: Economy assessment methodology

Scoring	Likely Impact : Employment Opportunities
-	Residential development proposals are located over 5km from a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals are located within 5km of a key employment location.

Notes

Information on key employment sites provided by the SWLP authorities.

Scoring	Likely Impact : Employment Floorspace
--	Development proposals which result in a significant net decrease in employment floorspace (over 1,000sqm).
-	Development proposals which result in a minor net decrease in employment floorspace (between one and 999sqm).
0	Development proposals would not impact employment floorspace.
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace or insufficient information is available.
+	Development proposals which result in a minor net increase in employment floorspace (between one and 999sqm).
++	Development proposals which result in a significant net increase in employment floorspace (over 1,000sqm).

Notes

Assessment of current land use made through reference to aerial photography and Google Maps⁸⁴.

Thresholds identified in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

⁸⁴ Google Maps (2020) Available at: <https://www.google.co.uk/maps> [Date accessed: 16/07/20]

2.17 Potential for mitigation

2.17.1 The evaluation of all locational reasonable alternatives (see **Appendices B-D**) has included consideration of ways in which identified adverse effects might be mitigated using the principles of the mitigation hierarchy which seeks the following prioritisation of mitigation interventions.

Table 2.15: *Summary of the mitigation hierarchy*

A	Avoid	Avoid impacts where possible.	<i>Achievable</i>
M	Mitigate	To reduce the level of impacts. This may serve to reduce significant impacts to minor or negligible.	<i>Challenging</i>
C	Compensate	Compensation should be used as a last resort.	<i>Complex</i>
X	Not possible	Likely irreversible effects.	
-	Not required	No adverse effects identified.	

2.18 Identifying the best performing option

2.18.1 The evaluation of sustainability performance using the SA Framework is necessarily high level and reflects the strategic nature of SEA. During the evaluation, where possible, a best performing option has been identified. The main caveat to this process is that the so-called best performing option is best performing in the context of available data that has informed the desktop assessment. Primary data obtained through site visits or new datasets that become available during the SA process may shed a different light on the performance of a particular reasonable alternative and to this end, the best performing options should all be interpreted with a strategic perspective. Identification of best performing options should help inform the selection of preferred options. It is possible that consultation exercises and primary data may enable a more detailed and accurate evaluation of the option at a later stage in the plan making process. Likewise, there are other considerations beyond the SA that will shape the plan and the subsequent preferred options.

2.19 Selection and rejection of reasonable alternatives

2.19.1 This report does not include any information about selection or rejection of reasonable alternatives.

3 Identification of reasonable alternatives

3.1 The Issues and Options Consultation Document

3.1.1 The Issues and Options consultation is the second stage in preparing the South Warwickshire Local Plan which is a new Plan for Stratford-on-Avon and Warwick District, following the Scoping and Call for Sites consultation in 2021. As the name suggests, it is a stage in the plan making that identifies the alternative ways of preparing the plan so that it can best reflect the strategic objectives centred around five overarching principles which will underpin the Plan:

- A climate resilient and net zero carbon South Warwickshire
- A well-designed and beautiful South Warwickshire
- A healthy, safe and inclusive South Warwickshire
- A well-connected South Warwickshire
- A biodiverse and environmentally resilient South Warwickshire.

3.2 The 20-minute Neighbourhood Concept

3.2.1 The Councils' have been considering the opportunity presented by the preparation of the Local Plan to create more compact and complete communities, where people have access to a good range of facilities to meet daily needs within easy walking or cycling distance. By reducing the need to travel by private car to meet daily needs, walkable communities have the potential to have reduced transport-related GHG emissions and as well as having health benefits for people undertaking active travel. Various distances can be used to define walkable neighbourhoods. 800m direct distance, measured as the crow flies, is considered to represent a journey by walking equivalent to 10 minutes each way⁸⁵.

3.3 Assessment of reasonable alternatives

3.3.1 Article 5(1) of the SEA Directive states that "*Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I*".

3.3.2 PPG Paragraph: 018 Reference ID: 11-018-20140306 states that "*Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings*".

3.4 Different reasonable alternatives

3.4.1 Different types of Reasonable Alternatives (RA) are possible and can be prepared for housing number, spatial options, site allocations and policies.

⁸⁵ TCPA (2021) The 20 Minute Neighbourhood TCPA. Available at <https://tcpa.org.uk/collection/the-20-minute-neighbourhood/> [Date accessed 21/09/22]

3.4.2 The key aspects that the SA and plan making process will need to consider in respect to RA are as follows:

- What reasonable alternatives have been identified and on what basis?
- How they have been assessed and compared (including consideration of sustainability issues)?
- What are the preferred alternatives and why they are preferred over other alternatives?

3.4.3 The RPTI have produced best practice guidance on 'SEA and Improving the effectiveness and efficiency of SEA/SA for land use plans'⁸⁶. This recommends a sequential approach to assessing RAs as set out in **Figure 1.4**.

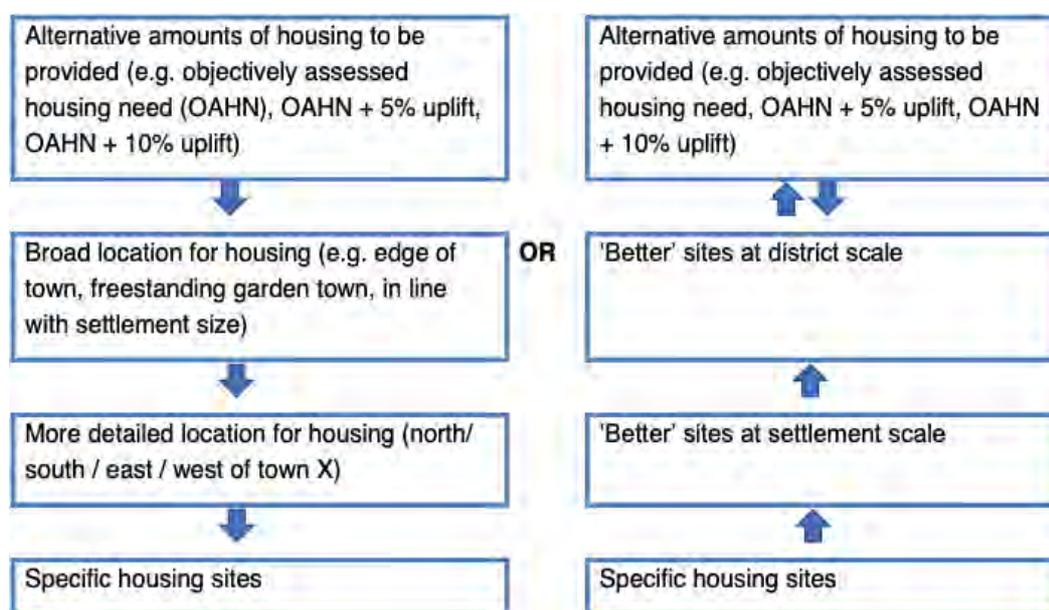


Figure 3.1: Suggested ways of sequencing of reasonable alternatives by RTPI [Source: RTPI]

3.4.4 The Councils have followed the approach set out on the left-hand side of **Figure 3.1** for both housing and employment growth. Details of the alternatives assessed, and their comparative performance against different SA objectives, have been evaluated through the SA process.

3.4.5 Reasonable alternatives to be addressed in this wider sustainability appraisal of the SWLP include those presented in **Figure 1.3**:

- Growth Options x 5
- Main Settlements expressed through Broad Locations x 32
- Smaller Settlement Locations x 22
- New Settlements x 7
- Policy Options x 116

⁸⁶ Royal Town Planning Institute (January 2018). Strategic Environmental Assessment -Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Accessed 14/04/21]

3.4.6 **Figure 3.2** illustrates the Councils’ rationale behind the different types of reasonable alternative that are included in the Issues and Options Consultation Document. This suite of reasonable alternatives represents a range of scales that can be reviewed as part of the plan making process. It is not exhaustive as there are other settlements in the plan area that have not been identified during this round of consultation. **Chapter 4** presents information about the methodology which has been used to evaluate the sustainability performance of each reasonable alternative.

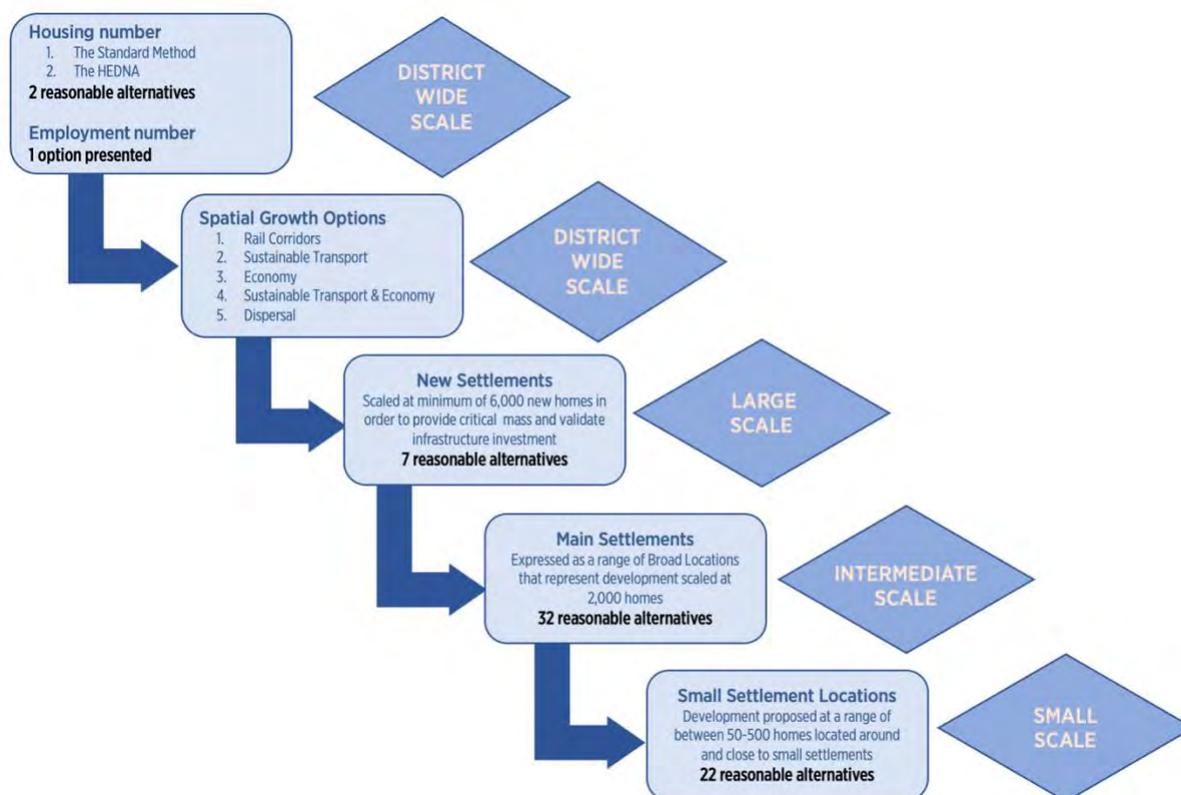


Figure 3.2: Different scales of reasonable alternative options. Together they include different reasonable alternatives that can be configured to supply the preferred options for the plan, the next stage of the plan making process

3.5 Initial identification of settlements

3.5.1 As part of their South Warwickshire Settlement Analysis⁸⁷, the Councils have initially identified a range of different settlements that approximately correlate with those Spatial Options that received support through responses received in relation to the first stage of SWLP Issues and Options Consultation (2021). The list included 30 settlements. The SA process has sought to apply the different development scales presented in **Figure 3.2** so that the Councils’ list of settlements could be logically divided into locations that might be able to deliver up to 2,000 homes, which have been identified as Broad Locations within the Main Settlements, as well as smaller locations that might be able to deliver 50-500 homes. Settlements identified in **bold font** indicate main settlements.

⁸⁷ Stratford-on-Avon and Warwick District Councils (June 2022) ‘South Warwickshire Settlement Analysis’

3.5.2 The Councils list is presented as

- **Alcester**
- Barford
- Bearley
- Bidford-on-Avon
- Bishops Tachbrook
- Claverdon
- Earlswood
- Hampton Magna
- Hatton Park
- Hatton Station
- Henley-in-Arden
- **Kenilworth**
- Kineton
- Kingswood (Lapworth)
- **Leamington, Warwick, Whitnash** and Cubbington⁸⁸
- Long Itchington
- Radford Semele
- Salford Priors
- **Shipston-on-Stour**
- South of Coventry
- **Southam**
- **Stratford-on-Avon**
- Studley
- Wellesbourne
- Wilmcote
- Wood End
- Wootton Wawen.

3.6 Methodology to identify reasonable alternative Broad Locations at the Main Settlements

3.6.1 In order to identify reasonable alternative development options that could be located near to existing services in the main settlements, and hence be more likely to deliver 20 minute neighbourhood principles, as well as deliver up to 2,000 homes as part of a single strategic allocation, the Main Settlements that are listed in **paragraph 3.5.2** have been divided into Broad Locations. This has been done on the basis that the main settlements were all sufficiently large that they could each have three or more Broad Locations associated with them. All BLs were identified using the methodology and criteria presented in **Figure 3.3**.

⁸⁸ As the route structures of these four individual settlements are intrinsically linked through coalescence, for the purpose of considering 'connectivity' and 'accessibility', they have been analysed together. Given the scale of the area studied across these four settlements, this is broken down into the following map areas within this document: Cubbington and North Leamington, Leamington Central, Leamington South, Warwick North, Warwick South, and Whitnash.

-
- 3.6.2 The presence of primary constraints including flood risk led to the exclusion of certain land parcels from the identification process. The BLs were then generally derived using cardinal points (as this gave a 4-point factor for division). As can be seen, larger locations like Kenilworth, Royal Leamington Spa and Stratford required further sub-division beyond four BLs.
- 3.6.3 This process lead to the identification of 32 BLs at the following main settlements:
- Alcester (x3)
 - Kenilworth (x6)
 - Royal Leamington Spa and Whitnash (x7)
 - Shipston-on-Stour (x4)
 - Southam (x4)
 - Stratford-upon-Avon (x5)
 - Warwick (x3)
- 3.6.4 For purposes which favour geographic convenience the main change Lepus made to the list to the list in **paragraph 3.5.2**, is that Whitnash has been presented as part of the Royal Leamington Spa cluster of Broad Locations. Likewise, Warwick and Leamington Spa are separate Main Settlements and Cubbington is a small settlement location. All BLs are presented in **Figure 4.1**.

IDENTIFYING REASONABLE ALTERNATIVE BROAD LOCATIONS

In accordance with generic 20 minute neighbourhood principles, which vary according to different of guidance, the BL boundary is based on a review of service provision. An area of search based on 800m from the of at least one of the following services associated with the main settlement has been used to define BL approximate 800m zone boundary:

- public transport access point, (train station or bus station);
 - GP surgery;
 - primary school;
 - local shop; and/or
 - publicly accessible green space.
- Where the 800m zone splits a land parcel, such as a field or woodland, the parcel is rejected if more than 50% of the land parcel lies outside of the 800m zone.
 - Where the 800m zone splits a land parcel, such as a field or woodland, the parcel is rejected if more than 50% of the land parcel coincides with a primary constraint including Flood Zones 2 or 3, AONB, ALC Grade 1, Scheduled Monuments, SSSI, Registered Parks and Gardens and ancient woodland.

The Broad Locations seek to accommodate up to 2,000 homes at 35 dwelling per hectare (dph). 35dph is considered a reasonable average housing density to inform the identification of potential locations for housing development in different types of locations and does not indicate a dph to be used in the masterplanning of future development sites. Housing to green space for green infrastructure should operate on a ratio of 60:40 of the total area. In other words, at least 40% of the land area should be planned for green infrastructure.

Figure 3.3: Procedure for identifying reasonable alternative Broad Locations

3.7 Methodology to identify Small Settlement Locations

- 3.7.1 To provide an alternative scale of development, the Councils identified 22 small settlement locations, not an exhaustive list, which fitted a number of criteria relating to accessibility and position in the settlement hierarchy. The Councils asked the SA team to identify locations around the small settlements that would be able to possibly accommodate 50-500 houses and help ensure the locations lend themselves to meeting the principles of 20-minute neighbourhoods. Being smaller and lacking some of the infrastructure associated with larger 20 minute neighbourhoods, it is accepted that the overall scale would be smaller than a typical 20 minute neighbourhood that might be found in a town or a city. For this reason, a 400m search zone was used to help identify the Small Settlement Locations. **Figure 3.4** presents the process that was followed to identify the small settlement locations.

IDENTIFYING REASONABLE ALTERNATIVE SMALL SETTLEMENT LOCATIONS

- Over 50% of the potential location should be within 400m of the small settlement edge;
- Over 50% of the potential location should be within 800m of at least one of the following services: public transport access point, (train station or bus station), GP surgery, a primary school, a local shop and/or publicly accessible green space;
- Over 50% of each field/land parcel does not coincide with a constraint including Flood Zones 2 or 3, AONB, ALC Grade 1, Scheduled Monuments, SSSI, Registered Parks and Gardens and ancient woodland;
- Sports facilities and publicly accessible greenspaces are included in the potential location, although it assumed that these would be retained;
- Farms and private residential properties are excluded from the potential location where practical; and
- Only greenfield locations, such as agricultural fields, have been included. The identification of small settlement locations does not include Previously Developed Land.

The small settlement locations are designed to accommodate between 50 and 500 units at a dwelling per hectare scale of 35dph. Housing to green space for green infrastructure should operate on a ratio of 60:40 of the total area. In other words, at least 40% of the land area should be planned for green infrastructure.

Figure 3.4: Procedure for identifying reasonable alternative Small Settlement Locations

- 3.7.2 Reasonable alternative development locations have been identified around the following small settlements:

<ul style="list-style-type: none">• Barford• Bearley• Bidford• Bishop's Tachbrook• Claverdon• Cubbington• Earlswood• Hampton Magna• Hatton Park• Hatton Station• Henley	<ul style="list-style-type: none">• Kineton• Kingswood• Long Itchington• Radford Semele• Salford Priors• South Coventry• Studley• Wellesbourne• Wilmcote• Wood End• Wootton Wawen
---	---

3.7.3 These are presented in **Figure 5.1**.

3.8 Methodology to identify New Settlement Locations

3.8.1 The 7 New Settlements Locations have been identified by the Councils. The SA Team has prepared a spatial expression of each New Settlement using a crude 250ha area of search in a circular search area around the approximate location provided by the Councils in the Issues and Options Consultation Report.

3.9 Methodology to identify Spatial Growth Options and Policy Options

3.9.1 The Councils have drawn on an earlier stage of consultation which was undertaken in 2021 to capture views from stakeholders and the public about the way the plan should begin to take shape. The 2021 consultation included seven growth options which have now been refined to produce five. These are:

- Rail Corridors
- Sustainable Travel
- Economy
- Sustainable Travel and Economy, and
- Dispersed.

3.10 Description and evaluation of effects

3.10.1 **Chapters 4 – 8** provides appraisal of the different types of reasonable alternative. The appendices provide more detail about how each reasonable alternative performs in terms of impact assessment score. Where possible, **Appendix B-D** also provides information about potential mitigation solutions that might be readily engaged to improve the sustainability performance.

4 Evaluation of the Broad Locations at the Main Settlements

4.1 The 32 Broad Locations

4.1.1 Reasonable alternative Broad Locations have been identified around various main settlements as follows:

- | | | |
|---|--|--|
| <ul style="list-style-type: none"> Alcester Northeast Alcester South Alcester West Kenilworth North Kenilworth Northeast Kenilworth Northwest Kenilworth South Kenilworth Southeast Kenilworth West Royal Leamington Spa East Royal Leamington Spa Northeast | <ul style="list-style-type: none"> Royal Leamington Spa Northwest Royal Leamington Spa South Royal Leamington Spa Southeast Royal Leamington Spa Southwest Shipston East Shipston North Shipston Southwest Shipston West Southam Northeast Southam Northwest | <ul style="list-style-type: none"> Southam Southeast Southam Southwest Stratford-upon-Avon East Stratford-upon-Avon Northeast Stratford-upon-Avon Northwest Stratford-upon-Avon South Stratford-upon-Avon Southwest Warwick Northeast Warwick Northwest Warwick West Whitnash |
|---|--|--|

4.1.2 **Figure 4.1** illustrates the distribution of the Broad Locations.

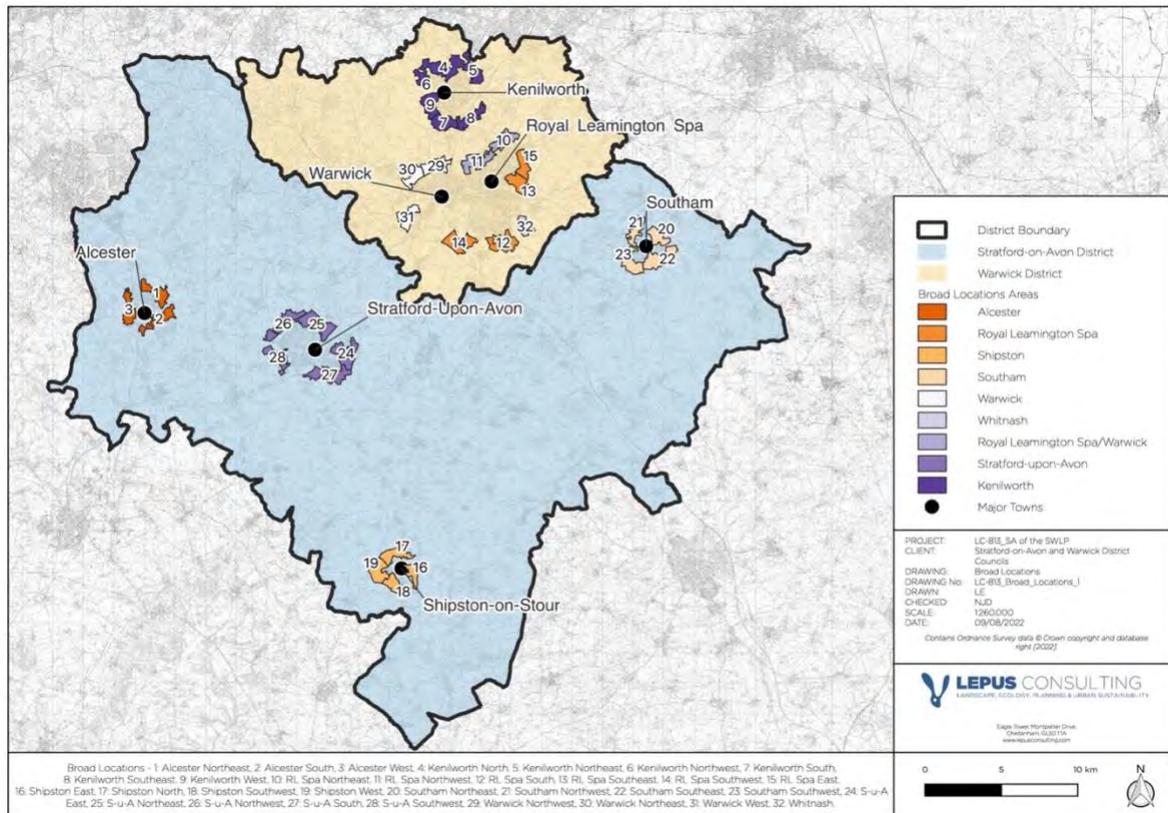
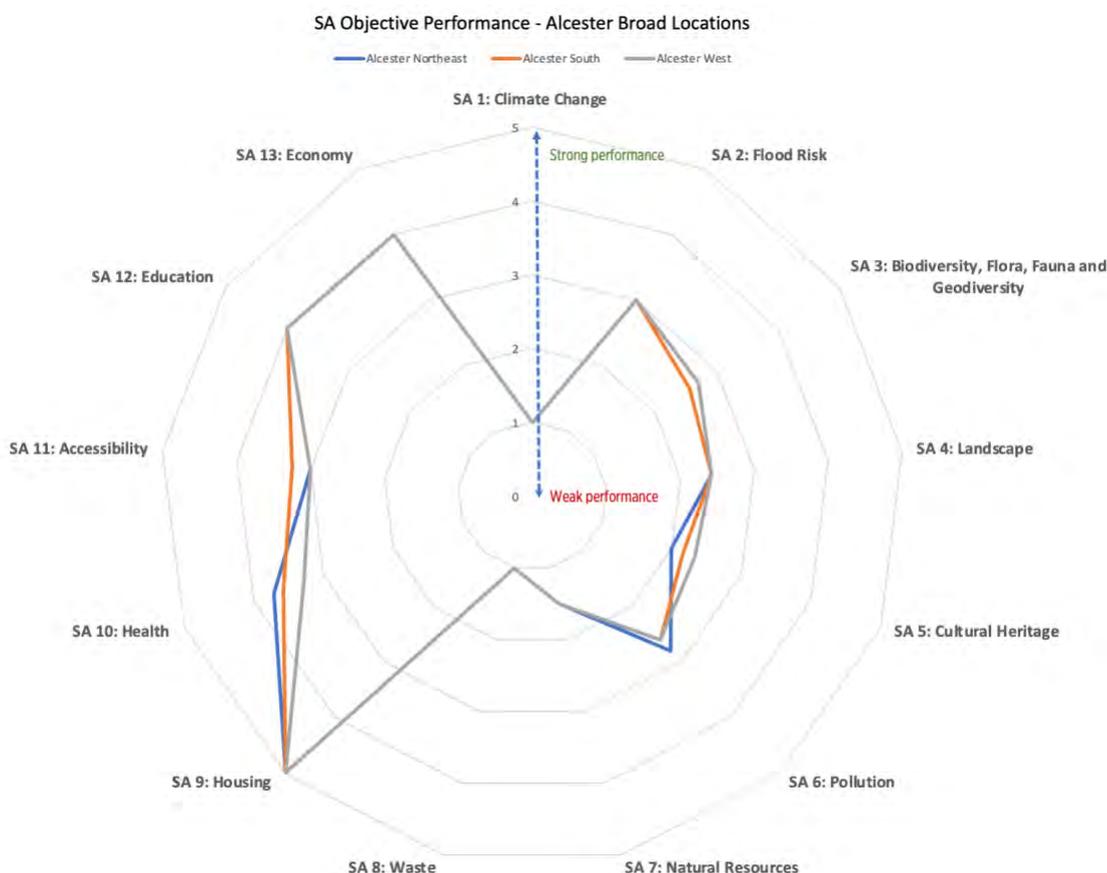


Figure 4.1: Reasonable alternative Broad Locations

4.2 Technical data

4.2.1 **Appendix B** provides an individual appraisal of each of the 32 Broad Locations. Each reasonable alternative has been assessed for likely impacts against the 13 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in the tables within each SA Objective, in accordance with the methodology set out in **Chapter 2**.

4.3 Alcester



SA Objective 1: Climate Change

4.3.1 All BLs perform similarly against SA Objective 1. Large scale residential-led development is likely to result in an increase in GHG emissions. Development of up to 2,000 dwellings could increase carbon emissions in the local plan area by more than 1% of the existing Stratford on Avon CO₂ emission levels (currently 625 dwellings) and result in a major adverse impact.

4.3.2 This can be partially mitigated through principles associated with ‘20-minute neighbourhoods’ which seek to reduce transport-related GHG emissions by neighbourhood design. The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging the use of active and public transport. This would in turn lead to a reduction in transport related GHG emissions. In addition, the SWLP will seek to make further reductions in GHG emissions through the adoption of energy efficiency and high sustainability standards for buildings to minimise carbon emissions.

- 4.3.3 Mitigation may be achieved by future policies in the SWLP which will seek to reduce GHG emissions associated with the construction and operation of homes. Impacts can be reduced by implementing low carbon building processes and, materials and operational consideration e.g. Passivhaus; Renewable energy; Modular housing. Higher density developments can make destinations easily accessible by walking or cycling and can bring people together to support local public transport, facilities and local services. Integrated active travel which maximises people's travel choices for low-carbon modes of transport like rail, bus, other public transport, walking and cycling is essential.
- 4.3.4 Support for decentralised, low carbon and renewable energy generation whether on site or standalone renewable energy generation sites will help reduce GHG emissions in the medium and long term.
- 4.3.5 The SWLP climate change study is currently being undertaken and is likely to provide further evidence to assist with the sustainability appraisal process.

SA Objective 2: Flood Risk

- 4.3.6 All BLs in Alcester coincide with scattered areas of low, medium, and high SWFR. Without mitigation, development at this location could have a major adverse impact on flooding. Sustainable drainage schemes which seek to reduce surface water flood risk by maintaining surface water drainage to 'greenfield runoff' rates can be used to mitigate development proposals which coincide with areas of SWFR.
- 4.3.7 No significant amount of flood zone 2 or 3 is present in any BL. The worst performing site is Alcester West, which has a small area at the centre of the site which coincides with Flood Zone 3. Alcester South has very small areas of coincidence with Flood Zone 2, whilst Alcester Northeast has small areas of Flood Zone 2 and 3. In both cases, impacts on the Flood Zone which could be mitigated by avoiding the Flood Zones. **Best performing BLs: Alcester Northeast and Alcester South**

SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

- 4.3.8 All BLs partially coincide with LWSs (such as 'Cold Comfort Lane Orchard', 'Oversley Mill Flood Meadows' and 'River Arrow') and Priority Habitats. Impacts can principally be mitigated by avoided by avoiding these areas in the development of the BLs. Design mitigation will be required if large scale development is located near an LWS. It is possible to mitigate effects with appropriate GI strategy and land management solutions.
- 4.3.9 Priority habitats not available for mapping include the network of hedgerows that cross all BLs. Biodiversity Net Gain strategies may be used to avoid no net loss. Veteran Tree data was not available and site visits would be helpful to collect further data.
- 4.3.10 Alcester South is in close proximity to ancient woodland; 'Oversley Wood' is located approximately 85m to the south of the location. A minor adverse impact on this ancient woodland could be expected. Impacts might include: increasing the amount of dust, light, water, air and soil pollution; increasing disturbance to wildlife, such as noise from additional people and traffic; increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas; increasing damaging activities like fly-tipping and the impact of domestic pets. **Best performing BL: Alcester Northeast and Alcester West**

SA Objective 4: Landscape

- 4.3.11 Minor adverse effects are associated with the 'Arden' SLA and various character sub-areas such as the Arden River Valleys and Arden Estatelands as development could alter the setting and character of the landscape. Landscapes in the Northeast and South have been identified as suitable for enhancement which possibly provides an opportunity for development to contribute to this. Development could also exacerbate urban sprawl and impact views for users of the PRoW network which includes promoted routes such as the Monarch's Way in Alcester West BL and Arden Way in Alcester Northeast and South. To mitigate these issues development design should follow and retain the landscape characteristics. All BLs perform similarly in terms of landscape sensitivity. Alcester NE and Alcester South include areas of high sensitivity landscape whilst the West has none.
Best performing BL: Alcester West

SA Objective 5: Cultural Heritage

- 4.3.12 Alcester is rich in cultural heritage and there are a number of important constraints that need to be considered as part of any development proposals at this location.
- 4.3.13 Alcester NE has a Grade 1 listed building on the edge of the location. A likely major adverse impact on the setting of the 'Church of St Mary the Virgin Dovecote', which is located 20m from the Broad Location, is possible. The same applies to the Grade II* listed building, Church of St Mary the Virgin'. A potential major adverse impact on the setting of the 'Church of St Mary the Virgin', which is located 25m from the Broad Location, is expected.
- 4.3.14 In terms of mitigation, both features lie outside the Broad Location and it may be possible that impacts on the significance of these assets could be avoided through the layout and design of the proposals.
- 4.3.15 Alcester West is adjacent to the conservation area 'Alcester' and adjacent to the northern end of 'Ragley Hall'. Development could adversely affect the setting of both features. Alcester West is also in proximity to several Grade II listed buildings that lie to the south of the BL; a small cluster also lie to the west of the BL; the setting of these may be less affected, if at all.
- 4.3.16 Alcester South performs best in terms of Cultural Heritage due to presenting the smallest impact on the settings of areas of cultural heritage. The impact the BLs have on the heritage assets can be effectively mitigated by appropriate and effective layout and design of the proposed development. **No best performing BL; Alcester South is the most constrained.**
- 4.3.17 A Heritage and Settlement Sensitivity Assessment has been undertaken which will provide further evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of Broad Locations.

SA Objective 6: Pollution

- 4.3.18 All BLs are likely to lead to increases in air pollution through increased traffic levels and vehicular travel. As the BLs have the capacity for up to 2,000 homes, an increase in local air pollution is possible. Further research is needed to confirm this.
- 4.3.19 All BLs coincide or are adjacent to watercourses, such as 'River Alne' and 'River Arrow', which may lead to the development proposals impacting local watercourses. It may be possible to mitigate the potential impacts on watercourses through the implementation of SuDS and GI to reduce the impact during construction and operational stages.

- 4.3.20 Alcester Northeast performs best as it is the only BL which does not coincide with a main road, reducing the likelihood of exposing site end-users to higher levels of transport-associated air and noise pollution. Issues of transport-associated noise and air pollution can be mitigated effectively through development layout and implementation of green buffers, such as hedgerows and vegetation to improve air quality. **Best performing BL: Alcester Northeast**

SA Objective 7: Natural Resources

- 4.3.21 All BLs are situated on previously undeveloped land and thus adversely impact land with potential environmental qualities that provide ecosystem services and contribute to environmental capital. Previously undeveloped land would be lost with development and very likely represent an irreversible impact.
- 4.3.22 All BLs are primarily situated on BMV land including ALC Grade 3 land, which is assumed to be ALC Grade 3a as classification sub-division is not available. The loss of agricultural land and BMV soils is very difficult to mitigate or compensate, even with land being used for GI and soils, due to BMV soil loss being a long-term, permanent impact.
- 4.3.23 Alcester Northeast performs best as it is only partially coincident with an MSA; the other BLs coincide wholly with the MSA. Mitigation would only be partially possible by seeking to retain areas of land for greenspace use. **Best performing BL: Alcester Northeast**

SA Objective 8: Waste

- 4.3.24 Any of the BLs could deliver up to 2,000 dwellings and could increase waste in the Plan area by more than 1%. The 1% principle is limited and only a coarse precautionary indicator. It applies to all BLs and is only a guideline. All sites perform in the same way and will lead to significant increases in waste.
- 4.3.25 In terms of mitigation potential, the Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods with the aim of reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.

SA Objective 9: Housing

- 4.3.26 All BLs perform very well against SA Objective 9, due to all the BLs consisting of residential-led developments. All BL developments will result in a net gain of housing, with the provision of up to 2,000 houses to be expected. This would contribute significantly to local housing needs and would be a major positive impact on housing provision.

SA Objective 10: Health

- 4.3.27 All BLs situated within target distances of leisure facilities, greenspace and PRow/cycle paths which positively impacts human wellbeing.
- 4.3.28 All BLs are located outside the sustainable distance from a hospital with an A&E department, which would have a minor impact on health. Minor impacts could possibly be mitigated by the implementation of new/improved public transport for patients.
- 4.3.29 Alcester Northeast performs best, being the only BL which does not coincide with a main road, with air quality and noise pollution levels expected to be lower at this BL. Also, Alcester West is further than the sustainable distance from a GP surgery, which would adversely impact the SA Objective for health. **Best performing BL: Alcester Northeast**

SA Objective 11: Accessibility

- 4.3.30 All BLs are within a sustainable distance from a local food shop, 'Tesco Express' and 'Waitrose & Partners Alcester'. This is a minor positive effect.
- 4.3.31 None of the BLs are within the sustainable target distance of a railway station, leading to a minor adverse impact on transport. Poor access to transport and local services could be mitigated by expanding and improving local public transport networks. Alcester NE falls outside of the target distance for a bus stop.
- 4.3.32 Alcester South is the best performing BL with moderate connectivity to the area around it compared to the poor connectivity attributed to other BLs. Poor connectivity of the other BLs can be effectively mitigated with implementation of transport schemes and improvements to active travel measures such as supporting cycle and pedestrian networks; some measures will require considerably more intervention than others to deliver a successful mitigation solution. **Best performing BL: Alcester South**

SA Objective 12: Education

- 4.3.33 Each BL is within the sustainable target distance to allow for access to Primary, Secondary School and to Tertiary Education. Alcester Northeast is the best performing BL, being closer to primary and non-selective secondary education than Alcester West, resulting in Alcester Northeast having a positive impact on education. **Best performing BL: Alcester Northeast**

SA Objective 13: Economy

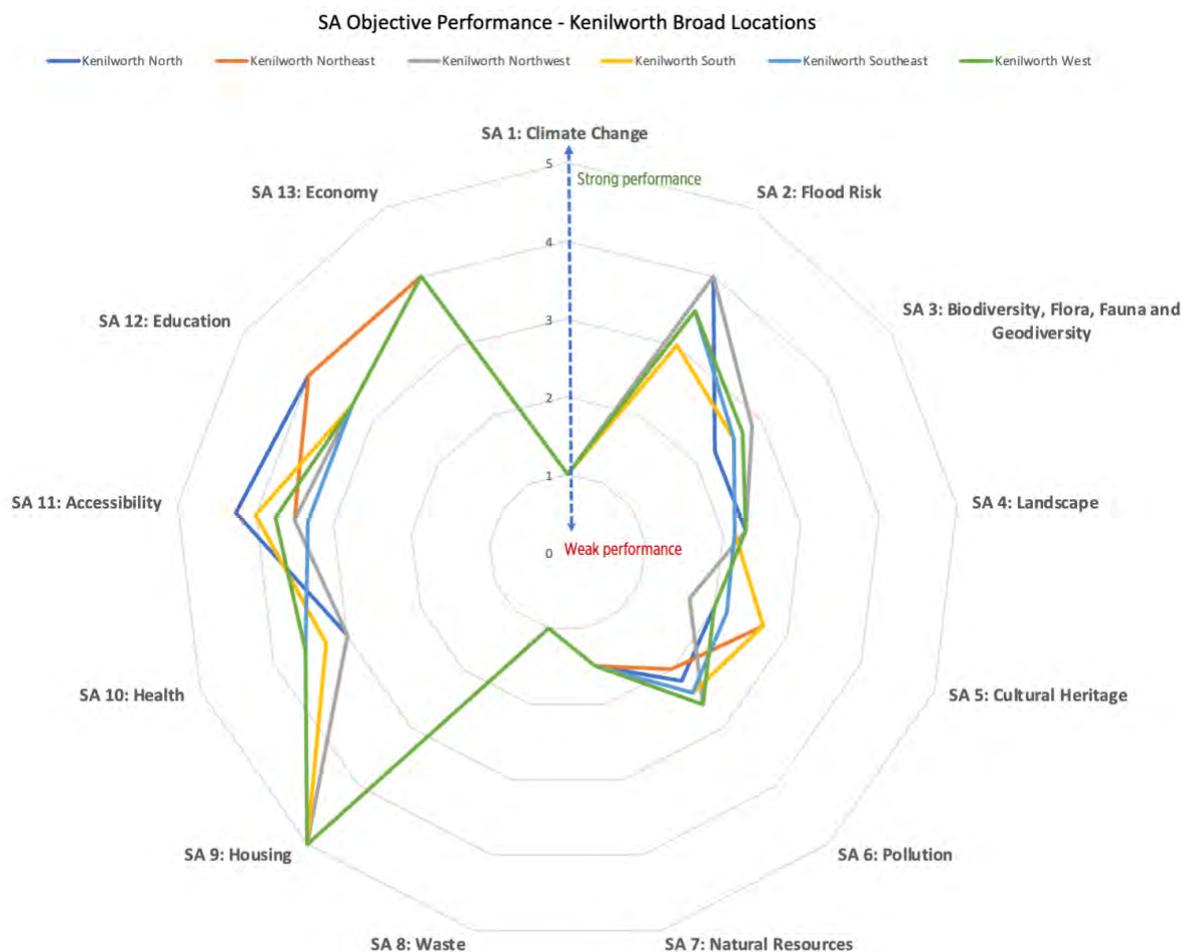
- 4.3.34 All BLs have good access to employment opportunities, meaning Alcester as a settlement performs well against SA Objective 13. Minor positive impacts on the local economy would be expected due to sustainable target distances to various business opportunities, including an industrial area in North Alcester.
- 4.3.35 Alcester Northeast performs best in terms of an 800m zone being closest to the large cluster of employment opportunities in Alcester, with the most potential to positively impact the local economy. **Best performing BL: Alcester Northeast**

4.4 Conclusion – Overall Rank

4.4.1 Alcester Northeast is the best performing Broad Location.

ALCESTER	Alcester Northeast	Alcester South	Alcester West
Climate change Reduce the SWLP authorities' contribution towards the causes of climate change.			
Flood risk Plan for anticipated levels of climate change.	=Best	=Best	
Biodiversity and geodiversity Protect, enhance and manage biodiversity and geodiversity.	= Best		= Best
Landscape Protect, enhance and manage the quality and character of landscapes and townscapes.			Best
Cultural heritage Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Best		Best
Environmental Pollution Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.	Best		
Natural resources Protect and conserve natural resources including soil, water and minerals.	Best		
Waste Reduce waste generation and disposal and support sustainable management of waste.			
Housing Provide affordable, high quality and environmentally sound housing for all.			
Human Health Safeguard and improve community health, safety and wellbeing.	Best		
Accessibility Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.		Best	
Education Increase access to education and improve attainment to develop and maintain a skilled workforce.	Best		
Economy Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.	Best		

4.5 Kenilworth



SA Objective 1: Climate Change

4.5.1 All BLs perform similarly against SA Objective 1. See **Section 4.3** for further commentary on the assessment of this objective

SA Objective 2: Flood Risk

4.5.2 Small proportions of Kenilworth Northeast, Kenilworth South and Kenilworth Southeast, coincide with Flood Zone 3 which presents a major adverse in terms of flood risk. Due to the low levels of coincidence at these BLs, the Flood Zone presence could be mitigated through avoidance. The same is true of sites which contain Flood Zone 2.

4.5.3 The worst performing site in terms of flood risk would be Kenilworth Northeast, due to a larger proportion at the centre of the site coinciding with Flood Zone 3. Flood zones in the other BLs can be mitigated by avoiding the flood zones more easily than Kenilworth Northeast. Kenilworth West would perform best in terms of flood risk due to the BL being wholly located within Flood Zone 1. It should be noted that all BLs coincide with areas of high Surface Water Flood Risk (which can be mitigated with the use of SuDS). **Best performing BL: Kenilworth North and Northwest**

SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

- 4.5.4 All BLs partially coincide with LWSs and Priority Habitats. Impacts can principally be mitigated by avoided by avoiding these areas in the development of the BLs. Design mitigation will be required if large scale development is located near an LWS. It is possible to mitigate effects with appropriate GI strategy and land management solutions.
- 4.5.5 Priority habitats not available for mapping include the network of hedgerows that cross all BLs. Biodiversity Net Gain strategies may be used to avoid no net loss. Veteran Tree data was not available and site visits would be helpful to collect further data.
- 4.5.6 Kenilworth North and Kenilworth Southeast are located adjacent to ancient woodland, which could lead to adverse impacts on these woodlands. Impacts might include: increasing the amount of dust, light, water, air and soil pollution; increasing disturbance to wildlife, such as noise from additional people and traffic; increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas; increasing damaging activities like fly-tipping and the impact of domestic pets.
- 4.5.7 Adverse impacts on the setting and biodiversity of the ancient woodland can be mitigated through the location and layout of developments, with the inclusion of suitable buffer zones on the edges of the development which are nearest to the ancient woodland. Kenilworth North and Kenilworth Northeast are located in close proximity to LNRs, which could lead to adverse impacts such as visitor pressure. It might be possible to mitigate potential adverse effects through suitable layout and location of this development, with the inclusion of suitable buffer zones.
- 4.5.8 The best performing BL in the settlement is Kenilworth Northwest, as it coincides with fewer LWSs and performs well against biodiversity receptors in the area. Kenilworth Northwest is likely to require less mitigation to reduce the likelihood of impacts to local designated sites and LWSs. **Best performing BL: Kenilworth Northwest**

SA Objective 4: Landscape

- 4.5.9 Kenilworth North, Northwest and Northeast each have similar performance levels in terms of impacts on their character areas. Each BL is located in the Arden Parklands character area, which includes opportunities for enhancement which implies that perhaps parts of the character area are better than others for development.
- 4.5.10 Development of up to 2,000 homes at any location in Kenilworth may lead to urban sprawl and is likely to affect views from PRoW.
- 4.5.11 Kenilworth South, Southeast and Northeast include a risk of coalescence with nearby settlements which is expected to increase with the development of Kenilworth Northeast (with Gibbet Hill), Kenilworth South (Ashow) and Kenilworth Southeast (Leek Wootton).
- 4.5.12 These adverse impacts will be difficult to avoid. Partial mitigation may be achieved using greenspace and sensitive design in the developments.
- 4.5.13 There is no landscape sensitivity data available. Additional surveys are required to understand latest sensitivity qualities at each BL (see **Chapter 12**). Desktop analysis of OS mapping and other sources suggests that Kenilworth Northwest and West have strong integrated landscapes with few infrastructure components or built forms that might detract from landscape quality. **Best performing BL: Kenilworth North**

SA Objective 5: Cultural Heritage

- 4.5.14 Kenilworth is rich in cultural heritage and there are a number of important constraints that need to be considered as part of any development proposals at this location.
- 4.5.15 Kenilworth West and Northwest are both in proximity to Grade 1 listed building, Kenilworth Castle. A likely major adverse impact on the setting is possible making mitigation more challenging.
- 4.5.16 All locations affect Grade II buildings to differing extents. In terms of mitigation, it may be possible that impacts on the significance of these assets could be avoided through the layout and design of the proposals. Locations associated with predicted major impacts may be more challenging to mitigate, if at all.
- 4.5.17 Kenilworth North, Kenilworth Southeast and Kenilworth West are located in close proximity to SMs and RPGs, causing a minor adverse impact.
- 4.5.18 Kenilworth North and Kenilworth Northwest are located in close proximity to CAs, adversely impact the setting of those areas. Potential impacts can be mitigated through location and layout plans of the developments.
- 4.5.19 **Best performing BL is Kenilworth Northeast.**
- 4.5.20 A Heritage and Settlement Sensitivity Assessment has been undertaken which will provide further evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of Broad Locations.

SA Objective 6: Pollution

- 4.5.21 Development at any of the six BLs are likely to increase air pollution through increased traffic levels and vehicular travel. As the BLs have the capacity for up to 2,000 homes, an increase in local air pollution is possible. Further research is needed to confirm this.
- 4.5.22 All BLs are located within 200m of a watercourse, with four BLs (Kenilworth Northwest, Kenilworth North, Kenilworth Northeast and Kenilworth West) coinciding with Groundwater SPZs. Minor adverse impacts could occur in relation to water quality. Impacts could be mitigated effectively through the use of GI and SuDS to reduce impacts associated with the operation of the development.
- 4.5.23 Kenilworth North and Kenilworth Northeast are located within close proximity to an AQMA. Close proximity to AQMAs could expose site end users to higher levels of air and noise pollution.
- 4.5.24 Kenilworth North, Kenilworth Northeast, Kenilworth South and Kenilworth Southeast are located within 200m of either a railway line or main road which could create a minor adverse impact due to exposure to air/noise pollution. Mitigation can be achieved through the implementation of green buffers and location and layout plans of future development.
- 4.5.25 Kenilworth West performs best with the lowest impact SA Objective 6 indicators, being furthest from watercourses, roads and groundwater SPZs than Kenilworth Northwest, the other BL which has the smallest impact on SA Objective 6. Kenilworth West would be expected to require the least mitigation to be suitable for development. **Best performing BL: Kenilworth West**

SA Objective 7: Natural Resources

- 4.5.26 All BLs situated on previously undeveloped land and thus adversely impacting land with potential environmental qualities that provide ecosystem services and contribute to environmental capital. Previously undeveloped land would be lost with development and very likely represent an irreversible impact.
- 4.5.27 All BLs are primarily situated on BMV land including ALC Grade 3 land, which is assumed to be ALC Grade 3a as classification sub-division is not available. The loss of agricultural land and BMV soils is very difficult to mitigate or compensate, even with land being used for GI and soils, due to BMV soil loss being a long-term, permanent impact.
- 4.5.28 Kenilworth Northeast performs best as it is only partially coincident (66%) with an MSA; the other BLs coincide wholly (or almost wholly) with the MSA. Mitigation would only be partially possible by seeking to retain areas of land for greenspace use. **Best performing BL: Kenilworth Northeast**

SA Objective 8: Waste

4.5.29

See **Section 4.8**.

SA Objective 9: Housing

4.5.30

See **Section 4.9**.

SA Objective 10: Health

- 4.5.31 With the exception of Kenilworth West, all BLs are located outside of the sustainable target distance of GP surgeries and Leisure facilities, meaning human wellbeing would be adversely impacted. These impacts can be mitigated through the increased provision of healthcare services in the BLs.
- 4.5.32 All BLs are within the sustainable distance for PRowS/Cycle Path Networks.
- 4.5.33 Only Kenilworth South and Kenilworth Southeast are within the sustainable target distance to a hospital with an A&E department, which would have a minor positive impact on health of site end users at these locations.
- 4.5.34 Only Kenilworth Northwest and West are not in proximity to a main road or AQMA. Adverse impacts on air and noise pollution are likely at the other BLS. Effects can possibly be mitigated by the location and layout plans of future proposals and the implementation of green buffers. **Best performing BL: Kenilworth South**

SA Objective 11: Accessibility

- 4.5.35 All BLs are within the sustainable target distance of a railway station and food stores. Three BLs are within the sustainable target distance of bus stops with regular services. These all represent positive effects.
- 4.5.36 Kenilworth Northwest, South and West are all outside the bus stop distance leading to a minor adverse impact at these locations since more people may be inclined to travel by car. This adverse impact can potentially be mitigated by the expansion and improvement to public transport, such as buses. Connectivity is generally poor throughout the settlement, with four BLs ranking at Grade D/E and consequently incurring a minor adverse impact on transport. Mitigation can be achieved through improvements to public transport provision, roads, pedestrian networks and active travel infrastructure.

- 4.5.37 Kenilworth North performs best as it incurs a minor adverse impact on access to food stores but is situated in an area with good connectivity (Grade B) to the wider SWLP area. **Best performing BL: Kenilworth North**

SA Objective 12: Education

- 4.5.38 Each BL is within the sustainable target distance to allow for access to Tertiary Education.
- 4.5.39 All except Kenilworth Southeast are inside the target distance for Primary Schools.
- 4.5.40 Kenilworth Northwest, Kenilworth South and Kenilworth West are located outside the sustainable target distance from a secondary school, which could effectively be mitigated through potential secondary education provisions within the BL layout plan.
- 4.5.41 Kenilworth North is the best performing BL with good access to primary and tertiary education and partial proportions of the site with access to secondary education. Therefore, less mitigation will be required at Kenilworth North than at other BLs to ensure good provisions for education. **Best performing BL: Kenilworth North**

SA Objective 13: Economy

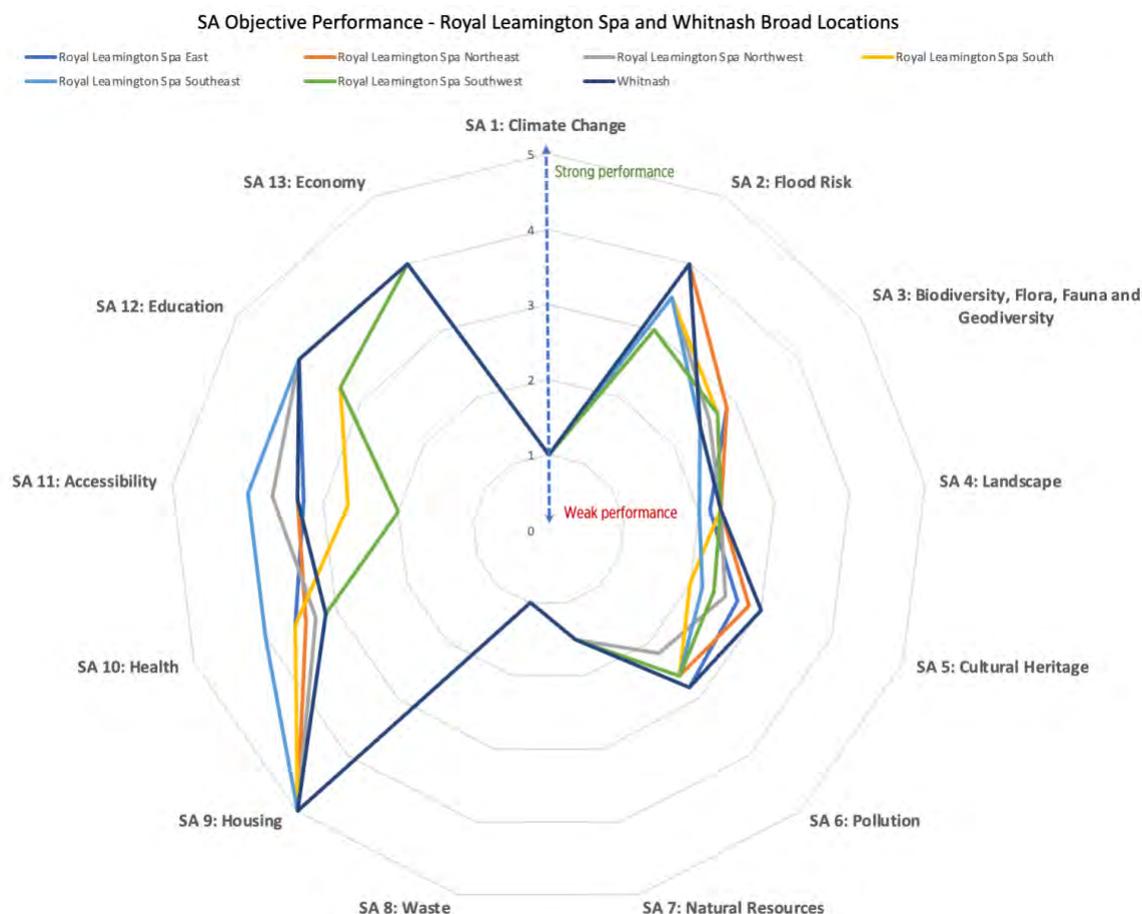
- 4.5.42 Kenilworth performs well against SA Objective 13, with all BLs having good access to employment opportunities. A minor positive impact on the local economy would be expected as locations are within the sustainable target distance to various business opportunities. T
- 4.5.43 The impact of the BLs on employment floorspace provision is uncertain as they are proposed to be situated on previously undeveloped land, with no loss of current employment space. There is potential to improve local economic centres, which may provide employment opportunities for current and future residents.
- 4.5.44 Kenilworth Northeast is the best performing BL, being closest to a number of employment opportunities in Kenilworth, which would consequently positively impact the local economy. **Best performing BL: Kenilworth Northeast**

4.6 Conclusion – Overall Rank

4.6.1 Broad Locations in the north perform better overall.

KENILWORTH	North	North east	North west	South	South east	West
Climate change Reduce the SWLP authorities' contribution towards the causes of climate change.						
Flood risk Plan for anticipated levels of climate change.	=Best	=Best				
Biodiversity and geodiversity Protect, enhance and manage biodiversity and geodiversity.			Best			
Landscape Protect, enhance and manage the quality and character of landscapes and townscapes.	Best					
Cultural heritage Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.		Best				
Environmental Pollution Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.						Best
Natural resources Protect and conserve natural resources including soil, water and minerals.		Best				
Waste Reduce waste generation and disposal and support sustainable management of waste.						
Housing Provide affordable, high quality and environmentally sound housing for all.						
Human Health Safeguard and improve community health, safety and wellbeing.				=Best		=Best
Accessibility Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.	Best					
Education Increase access to education and improve attainment to develop and maintain a skilled workforce.	Best					
Economy Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.		Best				

4.7 Royal Leamington Spa (RLS) & Whitnash



SA Objective 1: Climate Change

4.7.1 All BLs perform similarly against SA Objective 1. See **Section 4.3** for further commentary on the assessment of this objective

SA Objective 2: Flood Risk

4.7.2 All six BLs coincide with areas of high surface water flood risk. Small proportions of three of the BLs partially coincide with Flood Zone 3. Small proportions of two BLs partially coinciding with Flood Zone 2, presenting a negligible adverse impact. Due to the low levels of coincidence within the locations, mitigation can be achieved effectively with the use of SuDS.

4.7.3 RLS Northeast would perform best against flood risk as this BL is wholly located within Flood Zone 1 and is 300m from Flood Zone 3. RLS East, which is also located wholly in Flood Zone 1, is adjacent to Flood Zone 3. **Best performing BL: Royal Leamington Spa Northeast and RLS East**

SA Objective 3: Biodiversity, Flora, Fauna, and Geodiversity

- 4.7.4 All BLs coincide with LWSs. Impacts can principally be mitigated by avoided by avoiding these areas in the development of the BLs. Design mitigation will be required if large scale development is located near an LWS. It is possible to mitigate effects with appropriate GI strategy and land management solutions.
- 4.7.5 Six out of seven BLs coincide with Priority Habitats recorded on Natural England's national inventory. Priority habitats not available for mapping include the network of hedgerows that cross all BLs. Biodiversity Net Gain strategies may be used to avoid no net loss. Veteran Tree data was not available and site visits would be helpful to collect further data.
- 4.7.6 RLS Northeast is located adjacent to ancient woodland, which could result in adverse effect on the habitats and species associated with this designation. Adverse impacts can be mitigated through layout of developments to avoid these woodlands, as well as implementation of suitable buffers in areas of locations nearest to ancient woodlands.
- 4.7.7 RLS South East coincides with large parts of Leam Valley LNR. This would lead to direct adverse impacts through inter alia loss of habitat. Avoidance, buffer zones and a suitable development layout would help mitigate potential adverse effects. If this is not possible, complex mitigation solutions are possible through compensation. RLS East is open countryside adjacent to a Country Park which links with Leam Valley LNR. However, this is likely to be less impactful than allocating BL Southeast.

4.7.8 **Best performing BL: Royal Leamington Spa Northwest**

SA Objective 4: Landscape

- 4.7.9 All BLs are likely to contribute to urban sprawl and impacts are likely to affect views from the existing PRow network.
- 4.7.10 All BLs are coincident with landscape character areas that could be enhanced according to the 1993 Landscape Guidelines. This implies that there is potentially some sort of capacity for change in these areas albeit that the emphasis should be on enhancement.
- 4.7.11 Two BLs are associated with impacts on Country Parks. RLS East is located approximately 150m from 'Newbold Comyn' Country Park. A minor negative impact on the setting of this CP could be expected. RLS South East coincides with 'Newbold Comyn' Country Park. A major negative impact on this CP could be expected upon development at this Broad Location. These major adverse impacts will be difficult to avoid. The minor adverse impact may be mitigated through the location and layout of the future development, with the incorporation of suitable buffers if necessary. Mitigation may also be achieved using greenspace and sensitive design in the developments.
- 4.7.12 There is no landscape sensitivity data available. Additional surveys are required to understand latest sensitivity qualities at each BL (see **Chapter 12**). Desktop analysis of OS mapping and other sources suggests that RLS East and Southeast have strong integrated landscapes with few infrastructure components or built forms that might detract from the landscape. **Best performing BL: Royal Leamington Spa Northwest** probably because it shares the longest boundary with existing built form.

SA Objective 5: Cultural Heritage

- 4.7.13 Royal Leamington Spa is rich in cultural heritage and there are a number of important constraints that need to be considered as part of any development proposals at this location.

- 4.7.14 RLS South is located in proximity to the Church of St Chad a Grade I Listed Building. A minor adverse impact on the setting is possible and could be mitigated subject to field work establishing the precise nature of the impact on setting.
- 4.7.15 With the exception of RLS Northeast, all locations affect Grade II Listed Buildings to some extent. In terms of mitigation, it may be possible that impacts on the significance of these assets could be avoided through the layout and design of the proposals. Locations associated with predicted major impacts may be more challenging to mitigate, if at all.
- 4.7.16 There are no known constraints at Whitnash. **Best performing BL is Whitnash.**
- 4.7.17 A Heritage and Settlement Sensitivity Assessment has been undertaken which will provide further evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of Broad Locations.

SA Objective 6: Pollution

- 4.7.18 All BLs are likely to result in increases in air pollution through increased traffic levels and vehicular travel. As the BLs have the capacity for up to 2,000 homes, an increase in local air pollution is possible. Further research is needed to confirm this.
- 4.7.19 Except, RLS Northeast, all BLs are located within 200m of a watercourse. This could lead to minor adverse impacts from construction and operational phases of development.
- 4.7.20 RLS Northeast and RLS North West coincide with groundwater SPZs, potentially leading to minor adverse impact on water quality. This can be mitigated to some extent through the use of SuDS and GI to reduce the impact during the operation of the development.
- 4.7.21 Only RLS East and Whitnash are not located within 200m of either a railway line or main road. BLs next to a main road or rail route could potentially increase existing levels of air and noise pollution from vehicular traffic or noise from trains; minor adverse impacts in terms of increased pollution could be expected. Effective mitigation can be achieved through the implementation of green buffers and appropriate layout of future development.
Best performing BL: Royal Leamington Spa East

SA Objective 7: Natural Resources

- 4.7.22 All BLs situated on previously undeveloped land and thus adversely impacting land with potential environmental qualities that provide ecosystem services and contribute to environmental capital. Previously undeveloped land would be lost with development and very likely represent an irreversible impact.
- 4.7.23 All BLs are primarily situated on BMV land including ALC Grade 3 land, which is assumed to be ALC Grade 3a as classification sub-division is not available. The loss of agricultural land and BMV soils is very difficult to mitigate or compensate, even with land being used for GI and soils, due to BMV soil loss being a long-term, permanent impact.
- 4.7.24 Whitnash performs best as it is only partially coincident with an MSA; the other BLs coincide wholly with the MSA. Mitigation would only be partially possible by seeking to retain areas of land for greenspace use. **Best performing BL: Whitnash**

SA Objective 8: Waste

- 4.7.25

See **Section 4.8.**

SA Objective 9: Housing

- 4.7.26

See **Section 4.9.**

SA Objective 10: Health

- 4.7.27 All BLs situated within target distances for PRow/cycle paths which positively impacts human wellbeing. Most are within the target distance for greenspace.
- 4.7.28 RLS East is the only BL which lies outside of the sustainable distance from a hospital with an A&E department, which would have a minor impact on health. Minor impacts could possibly be mitigated by the implementation of new/improved public transport for patient or the introduction of new facilities nearby. This could be challenging to deliver.
- 4.7.29 Five BLs are located, to some extent, within the sustainable target distance from GP Surgeries; Whitnash only approximately 50m within the sustainable target distance, BL RLS Northwest and Southwest do not.
- 4.7.30 Six BLs located outside the sustainable target distance from leisure facilities, which would present minor adverse impacts at these locations. **Best performing BL: Royal Leamington Spa Southeast**

SA Objective 11: Accessibility

- 4.7.31 Only RLS Southwest lies outside of the sustainable distance to a bus stop. Yet, only two locations, Northwest and Southeast are within the sustainable distance to a railway station, making these locations both strong performers in terms of public access.
- 4.7.32 Access to food stores varies: only half of the BLs have good access to a foodstore within the sustainable walking and cycling zone. This would lead to minor adverse impacts on the transport in and around the BLs, affecting connectivity to the surrounding areas. This can be mitigated through the increased provision of public transport and services.
- 4.7.33 Connectivity data was not available for the majority of the BLs in RLS so more information is needed in this respect. RLS East has poor connectivity to the wider plan area which would lead to a minor adverse impact on connectivity. This can be mitigated through improvements to road and pedestrian networks, transport improvement schemes and the implementation of active travel measures. **Best performing BL is RLS Southeast.**

SA Objective 12: Education

- 4.7.34 All BLs are situated within the target distance to primary education, leading to a minor positive impact for young children and families who wish to walk or cycle to school. The same applies to tertiary education access.
- 4.7.35 Five BLs are within the sustainable target distance of Secondary Schools, with South and Southwest being outside it. Minor adverse impacts associated with distance to secondary educational facilities can be mitigated through increased provision in the BLs. RLS Northwest is the best performing BL as it is wholly located within 1.5km of a secondary school, with a proportion of other BLs not being within the sustainable target distance. **Best performing BL: Royal Leamington Spa Northwest**

SA Objective 13: Economy

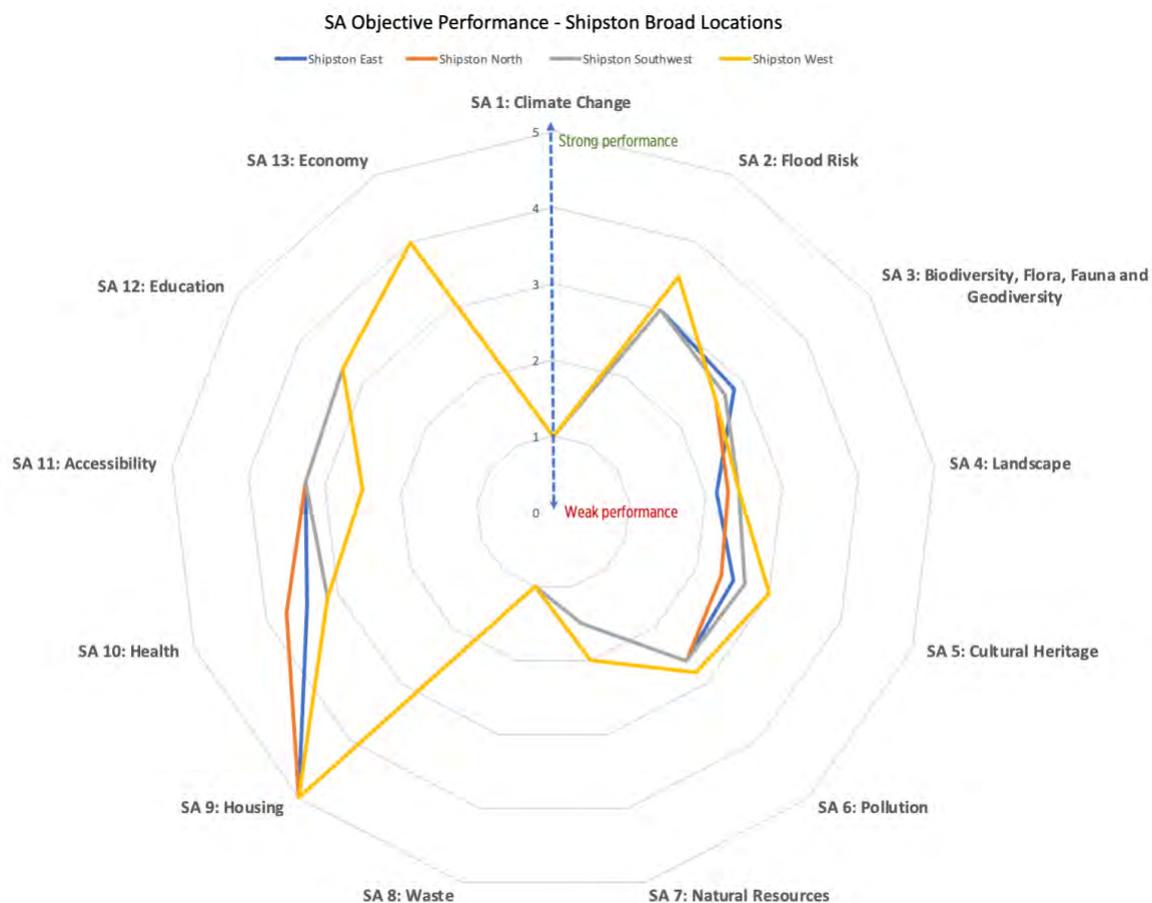
- 4.7.36 RLS performs well against SA Objective 13, due to all BLs having good access to employment opportunities. This would be expected to have a minor positive impact on the local economy as BLs are within the sustainable target distance to various businesses and employment opportunities. The impact of the BLs on employment floorspace provision is uncertain as they are planned on undeveloped land, which will result in no loss of current employment space. There is also potential to boost local economic centres, providing employment opportunities for current and future residents. RLS Southwest is the best performing BL, being closest to a number of employment opportunities in RLS. **Best performing BL: Royal Leamington Spa Southwest**

4.8 Conclusion – Overall Rank

4.8.1 No clear best performing Broad Location.

ROYAL LEAMINGTON SPA	East	North east	North west	South	South east	South west	Whitnash
Climate change Reduce the SWLP authorities' contribution towards the causes of climate change.							
Flood risk Plan for anticipated levels of climate change.	=Best	=Best					
Biodiversity and geodiversity Protect, enhance and manage biodiversity and geodiversity.			Best				
Landscape Protect, enhance and manage the quality and character of landscapes and townscapes.			Best				
Cultural heritage Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.							Best
Environmental Pollution Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.	Best						
Natural resources Protect and conserve natural resources including soil, water and minerals.							Best
Waste Reduce waste generation and disposal and support sustainable management of waste.							
Housing Provide affordable, high quality and environmentally sound housing for all.							
Human Health Safeguard and improve community health, safety and wellbeing.					Best		
Accessibility Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.					Best		
Education Increase access to education and improve attainment to develop and maintain a skilled workforce.			Best				
Economy Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.						Best	

4.9 Shipston-on-Stour



SA Objective 1: Climate Change

4.9.1 All BLs perform similarly against SA Objective 1. See **Section 4.3** for further commentary on the assessment of this objective

SA Objective 2: Flood Risk

4.9.2 All four BLs coinciding with areas of high surface water flood risk. Also, small proportions of Shipston East, Shipston North and Shipston Southwest partially coincide with Flood Zone 3 and as such, present a negligible impact. Due to the low proportion of the sites coinciding with the flood zone, mitigation can be achieved through avoidance of the Zones.

4.9.3 Shipston West would perform the best in terms of flood risk due to this BL being wholly located within Flood Zone 1. Therefore, none of Shipston West would be require mitigation when avoiding other Flood Zones, which will occur in the other BLs. Surface Water Flood Risk can be mitigated with the appropriate use of SuDS. **Best performing BL: Shipston West**

SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

- 4.9.4 The settlement as a whole performs reasonably well against SA Objective 3, with the BLs located far enough from any SACs, NNRs, Ancient Woodlands, LNRs or LGSs as to not impact upon the biodiversity, flora, fauna, or geodiversity in these areas of interest. Shipston North and Shipston West coincide with SSSI IRZs, meaning that adverse impacts are possible as consultation is required for residential developments of 100 units or more. Mitigation may or may not be required, dependant on the outcome of consultation with Natural England. However, all BLs coincide with LWSs, with Shipston North, Shipston Southwest and Shipston West all coinciding with Priority Habitats on the Natural England Inventory. Priority habitats not available for mapping include the network of hedgerows that cross all BLs. Biodiversity Net Gain strategies may be used to avoid no net loss. Veteran Tree data was not available and site visits would be helpful to collect further data.

Best performing BL: Shipston East

SA Objective 4: Landscape

- 4.9.5 All BLs are within the visual envelope of the AONB and minor adverse effects might be expected in terms of introducing up to 2,000 new dwellings on any side of Shipston-on-Stour. Field work evaluation is necessary to better understand the full impacts.
- 4.9.6 All BLs are likely to contribute to urban sprawl and impacts are likely to affect views from the existing PRow network.
- 4.9.7 Shipston East could potentially lead to coalescence with Willington. Design and layout could help mitigate and ultimately avoid this impact.
- 4.9.8 All BLs are coincident with landscape character areas that could be enhanced according to the 1993 Landscape Guidelines. This implies that there is potentially some sort of capacity for change in these areas albeit that the emphasis should be on enhancement.
- 4.9.9 Landscape sensitivity data shows that Shipston Southwest and West are in areas of medium sensitivity. Minor adverse effects are expected which can be mitigated through appropriate design of the development. Shipston East and North both contain substantial quantities of high/medium and high sensitivity land parcels. This will be more challenging to mitigate and major adverse effects are anticipated. Shipston East is also located on the eastern banks of the River Stour and would change the setting of the river. **Best performing BL: Shipston Southwest or West**

SA Objective 5: Cultural Heritage

- 4.9.10 Shipston North is in close proximity to two Grade I Listed Buildings, with Shipston East located within close proximity to a Grade II* Listed Building. Also, Shipston East, Shipston North and Shipston Southwest have a minor adverse impact on the setting attributed to these Grade II Listed Buildings. These minor adverse impacts can most likely be mitigated effectively by avoiding heritage assets with appropriate layout design of future developments.
- 4.9.11 Shipston North is located within close proximity to a RPG, presenting a minor adverse impact. Shipston East and Shipston North are located in close proximity to CAs, adversely impacting the setting of those areas. Again, these impacts can be mitigated through appropriate layout design of the developments.
- 4.9.12 There are no known constraints at Shipston West. **Best performing BL is Shipston West.**

- 4.9.13 A Heritage and Settlement Sensitivity Assessment has been undertaken which will provide further evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of Broad Locations.

SA Objective 6: Environmental Pollution

- 4.9.14 Development at any of the six BLs are likely to result increases in air pollution through increased traffic levels and vehicular travel. As the BLs have the capacity for up to 2,000 homes, an increase in local air pollution is possible. Further research is needed to confirm this.
- 4.9.15 All BLs are located in close proximity to a main road, which will lead to a minor adverse impact in terms of increased air, noise and light pollution. Mitigation can be achieved through the implementation of green buffers to improve air quality, as well as avoiding the impacts through appropriate layout design of the development.
- 4.9.16 Shipston West is the best performing BL, as it is the only BL that does not coincide or is located adjacent to a watercourse, meaning development would not lead to direct pollution of the watercourse. **Best performing BL: Shipston West**

SA Objective 7: Natural Resources

- 4.9.17 All BLs situated on previously undeveloped land and thus adversely impacting land with potential environmental qualities that provide ecosystem services and contribute to environmental capital. Previously undeveloped land would be lost with development and very likely represent an irreversible impact.
- 4.9.18 All BLs are primarily situated on BMV land including ALC Grade 3 land, which is assumed to be ALC Grade 3a as classification sub-division is not available. The loss of agricultural land and BMV soils is very difficult to mitigate or compensate, even with land being used for GI and soils, due to BMV soil loss being a long-term, permanent impact.
- 4.9.19 BL Shipston West performs best due to not coinciding with an MSA in comparison to other BLs which wholly or partially coincide with MSAs. **Best performing BL: Shipston West**

SA Objective 8: Waste

- 4.9.20

See **Section 4.8**.

SA Objective 9: Housing

- 4.9.21

See **Section 4.9**.

SA Objective 10: Health

- 4.9.22 All BLs are within the target distance to PRow/cycle networks, positively impacting human wellbeing. However, all BLs are outside the sustainable distance from a hospital with an A&E department leading to adverse sustainability performance in this respect.
- 4.9.23 Shipston East and Southwest are partially within the sustainable target distance to a leisure facility. This would be expected to have a minor positive impact on health. Shipston North and West have a majority of the BL area within the sustainable target distance to a leisure facility. This would be expected to have a major positive impact on health.
- 4.9.24 Shipston North and East are both partially within the target distance for GP surgery.

- 4.9.25 All BLs coincide with or are located in close proximity to a main road which presents a minor adverse impact on air quality and noise pollution in BLs of Shipston. Shipston West is located outside of the sustainable target distance from a greenspace. Minor adverse impacts associated with air quality and noise pollution can be mitigated through the implementation of green buffers to enhance air quality and human wellbeing. Adverse impacts associated with access to greenspace can be mitigated through appropriate planning and layout design of settlements. **Best performing BL: Shipston North**

SA Objective 11: Accessibility

- 4.9.26 Shipston West is the poorest location: it has minor negative effects associated with all of the sustainable distances. Southwest also falls outside of the sustainable target distance from bus stops. Excepting Shipston West, all locations are within the sustainable target distance of a food store.
- 4.9.27 Shipston East, Shipston North and Shipston Southwest have moderate connectivity to the wider plan area (Grade C connectivity) and Shipston West has poor connectivity which could see increased travel by car. This can be mitigated through road and pedestrian network improvements, also public transport improvement schemes and active travel measures.
- 4.9.28 Shipston West is the best performing BL in the settlement as it is the only one within the sustainable target distance of a food store. **Best performing BL: Shipston East and Shipston North**

SA Objective 12: Education

- 4.9.29 No BLs are located inside of the sustainable target distance of any tertiary education centres which would be expected to lead to a minor adverse impact on access to education. Adverse impacts could be mitigated through primary and tertiary education provisions within the BL plan layout although this could be a complex level of mitigation.
- 4.9.30 All BLs are within the target distance for primary and secondary education.
- 4.9.31 Shipston North is the best performing BL, with largest proportion of the location within the 800m sustainable target distance of educational facilities. **Best performing BL: Shipston North**

SA Objective 13: Economy

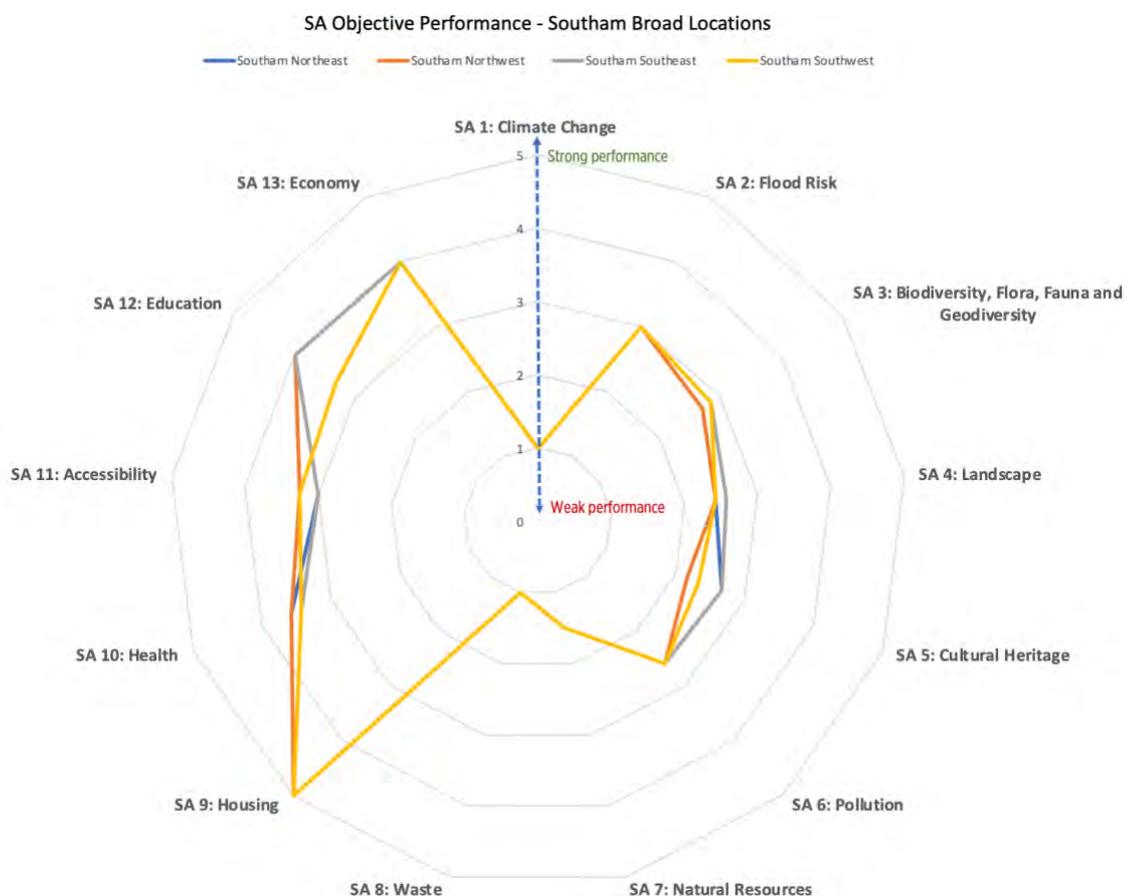
- 4.9.32 Shipston performs well against receptors attributed to SA Objective 13, due to all BLs having good access to employment opportunities. This would have a minor positive impact on the local economy as it is within the sustainable target distance to various business opportunities.
- 4.9.33 The impact of the BLs on employment floorspace provision is uncertain as they are proposed to be situated on previously undeveloped land. No loss of current employment space will be incurred, as well as potential to improve the local economic centres, potentially providing employment opportunities for current and future residents.
- 4.9.34 Shipston North is the best performing BL, being closest BL to two employment opportunities in the local area to Shipston, positively impacting the local economy most easily. **Best performing BL: Shipston North**

4.10 Conclusion – Overall Rank

4.10.1 Shipston West has least environmental constraints. Shipston North has good service provision in the target distances.

SHIPSTON-ON-STOUR	East	North	South west	West
Climate change Reduce the SWLP authorities' contribution towards the causes of climate change.				
Flood risk Plan for anticipated levels of climate change.				Best
Biodiversity and geodiversity Protect, enhance and manage biodiversity and geodiversity.	Best			
Landscape Protect, enhance and manage the quality and character of landscapes and townscapes.			=Best	=Best
Cultural heritage Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.				Best
Environmental Pollution Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.				Best
Natural resources Protect and conserve natural resources including soil, water and minerals.				Best
Waste Reduce waste generation and disposal and support sustainable management of waste.				
Housing Provide affordable, high quality and environmentally sound housing for all.				
Human Health Safeguard and improve community health, safety and wellbeing.				
Accessibility Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.	=Best	=Best		
Education Increase access to education and improve attainment to develop and maintain a skilled workforce.		Best		
Economy Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.		Best		

4.11 Southam



SA Objective 1: Climate Change

4.11.1 All BLs perform similarly against SA Objective 1. See **Section 4.3** for further commentary on the assessment of this objective.

SA Objective 2: Flood Risk

4.11.2 All four BLs coincide with small and infrequent areas of high surface water flood risk, which could have a negligible impact on flooding. Coincidence with surface water flood risk areas can be effectively mitigated with the use of SuDS. Small proportions of all of the BLs partially coincide with Flood Zone 3, presenting a negligible effect in terms of flood risk. Due to the low levels of coincidence, the flood zone can be avoided.

4.11.3 Southam Northeast performs the best in terms of flood risk due to having the smallest proportion of the site coinciding with Flood Zone 3. **Best performing BL: Southam Northeast**

SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

4.11.4 Southam performs reasonably well against SA Objective 3, with no SACs, SSSIs, NNRs, LNRs or Priority Habitats located within close proximity to the BLs, meaning there is little chance of direct adverse effects arising on the biodiversity, flora, fauna, or geodiversity at these designated sites.

4.11.5 Southam Northwest is located in close proximity to Thorpe Rough Ancient Woodland, possibly leading to adverse impacts. Southam Northeast coincides with 'Southam Bypass Cutting' LWS, also resulting in a minor adverse impact. These minor adverse impacts can be most likely be mitigated through the layout design of future proposals and the inclusion of appropriate buffers.

4.11.6 The best performing BL in the settlement is Southam Southeast, as it is the only BL which does not coincide in any way with an LWS. However, none of the BLs are especially or obviously constrained by biodiversity receptors. **Best performing BL: Southam Southeast**

SA Objective 4: Landscape

4.11.7 All BLs are likely to contribute to urban sprawl and impacts are likely to affect views from the existing PRow network.

4.11.8 Only Southam Northwest is coincident with a landscape character area that could be enhanced according to the 1993 Landscape Guidelines: Feldon Character Area. This implies that there is potentially some sort of capacity for change in these areas albeit that the emphasis should be on enhancement. The age of the 1993 document is also relatively old and needs to be updated.

4.11.9 Landscape sensitivity data shows that Southam Southeast is in an area of medium landscape sensitivity. Minor adverse effects are expected which could be mitigated through appropriate design of the development. The other three BLs each contain substantial quantities of high/medium and high sensitivity land parcels. This will be more challenging to mitigate and major adverse effects are anticipated. **Best performing BL: Southam Southwest**

SA Objective 5: Cultural Heritage

4.11.10 All BLs are located within close proximity with 'Southam Conservation Area' which would lead to a minor adverse impact on the setting of this Conservation Area. The minor adverse impact could be mitigated through landscape led design and further heritage assessment to help conserve and enhance the setting of the Conservation Area.

4.11.11 Broad Location South Northwest coincides with the Scheduled Monument 'The Holy Well'. As a result, a major negative impact would be expected on the setting of this SM. Southam Southwest is in close proximity to the same feature and minor adverse impacts on setting are likely.

4.11.12 Southam Northeast and Southam Southeast are the best performing BLs despite being within close proximity to Grade II Listed Buildings, in comparison to Southam Northwest and Southam Southwest, which coincide with Grade II Listed Buildings. Major adverse impacts are more challenging to mitigate than minor adverse effects. **Best performing BL: Southam Northeast.**

4.11.13 A Heritage and Settlement Sensitivity Assessment has been undertaken which will provide further evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of Broad Locations.

SA Objective 6: Pollution

4.11.14 All BLs are likely to result increases in air pollution through increased traffic levels and vehicular travel. As the BLs have the capacity for up to 2,000 homes, an increase in local air pollution is possible. Further research is needed to confirm this.

- 4.11.15 All BLs are adjacent to the watercourses 'River Stowe' and 'River Itchen', which may lead to the development proposals polluting the watercourses. This minor adverse impact can be effectively mitigated through the use of SuDS and GI to reduce the impact during the operation of the development.
- 4.11.16 All BLs are located in close proximity to a main road, which will lead to a minor adverse impact in terms of increased air, noise and light pollution. Mitigation can be achieved through the implementation of green buffers to improve air quality, as well as avoiding the impacts through appropriate layout design of the development.
- 4.11.17 All of the BLs perform very similarly in all of the SA Objective 6 receptors, there is **no best performing BL**.

SA Objective 7: Natural Resources

- 4.11.18 All BLs situated on previously undeveloped land and thus adversely impacting land with potential environmental qualities that provide ecosystem services and contribute to environmental capital. Previously undeveloped land would be lost with development and very likely represent an irreversible impact.
- 4.11.19 All BLs are primarily situated on BMV land including ALC Grade 3 land, which is assumed to be ALC Grade 3a as classification sub-division is not available. The loss of agricultural land and BMV soils is very difficult to mitigate or compensate, even with land being used for GI and soils, due to BMV soil loss being a long-term, permanent impact.
- 4.11.20 Southam SE performs marginally best as it is only partially coincident with an MSA; the other BLs coincide wholly with the MSA. Mitigation would only be partially possible by seeking to retain areas of land for greenspace use. **Best performing BL: Southam Southeast**

SA Objective 8: Waste

- 4.11.21 See **Section 4.8**.

SA Objective 9: Housing

- 4.11.22 See **Section 4.9**.

SA Objective 10: Health

- 4.11.23 All BLs located are within the sustainable target distance of PRoW/cycle paths and greenspaces. This would result in human wellbeing being positively impacted at all BLs. However, all BLs are outside the sustainable distance from a hospital with an A&E facility.
- 4.11.24 All BLs are partially within the target distance for GPs, Southam Southwest being the BL with the largest area of coincidence. Southam Southeast and Southam Southwest are outside the sustainable target distance to a leisure facility which would have a minor impact on health.
- 4.11.25 All of BLs coincide with or are located in close proximity to a main road which presents a minor adverse impact on air quality and noise pollution. This minor adverse impact can be mitigated through the implementation of green buffers to protect and enhance air quality, and human wellbeing. **Best performing BL: Southam Northeast and Northwest**.

SA Objective 11: Accessibility

- 4.11.26 All BLs are outside the sustainable target distance from railway stations. This is a minor adverse effect that can only be addressed with infrastructure changes.

- 4.11.27 All BLs are with the target distances for bus stops and food stores, which is a positive effect.
- 4.11.28 Southam Northwest and Southam Southwest have moderate connectivity to the wider plan area (Grade C connectivity). Southam Northeast and Southam Southeast have poor connectivity which will be a minor adverse impact on accessibility. This can be mitigated through road, pedestrian and cycle network improvements, public transport improvement schemes and increases active travel measures.
- 4.11.29 Southam Southwest is the best performing BL as a greater proportion of this BL is located within the sustainable target distance of a food store than Southam Northwest, meaning the development will have a smaller adverse impact on access to food stores. It should be noted that both BLs are very similar in their suitability for development. **Best performing BL: Southam Southwest**

4.12 SA Objective 12: Education

- 4.12.1 All BLs are within the sustainable target distance to primary, secondary and tertiary education, leading to a minor positive impact on access to education. Southam Northeast performs best, having the largest proportion within the 800m sustainable target distance to a primary school of the BLs in Southam. **Best performing BL: Southam Northeast**

SA Objective 13: Economy

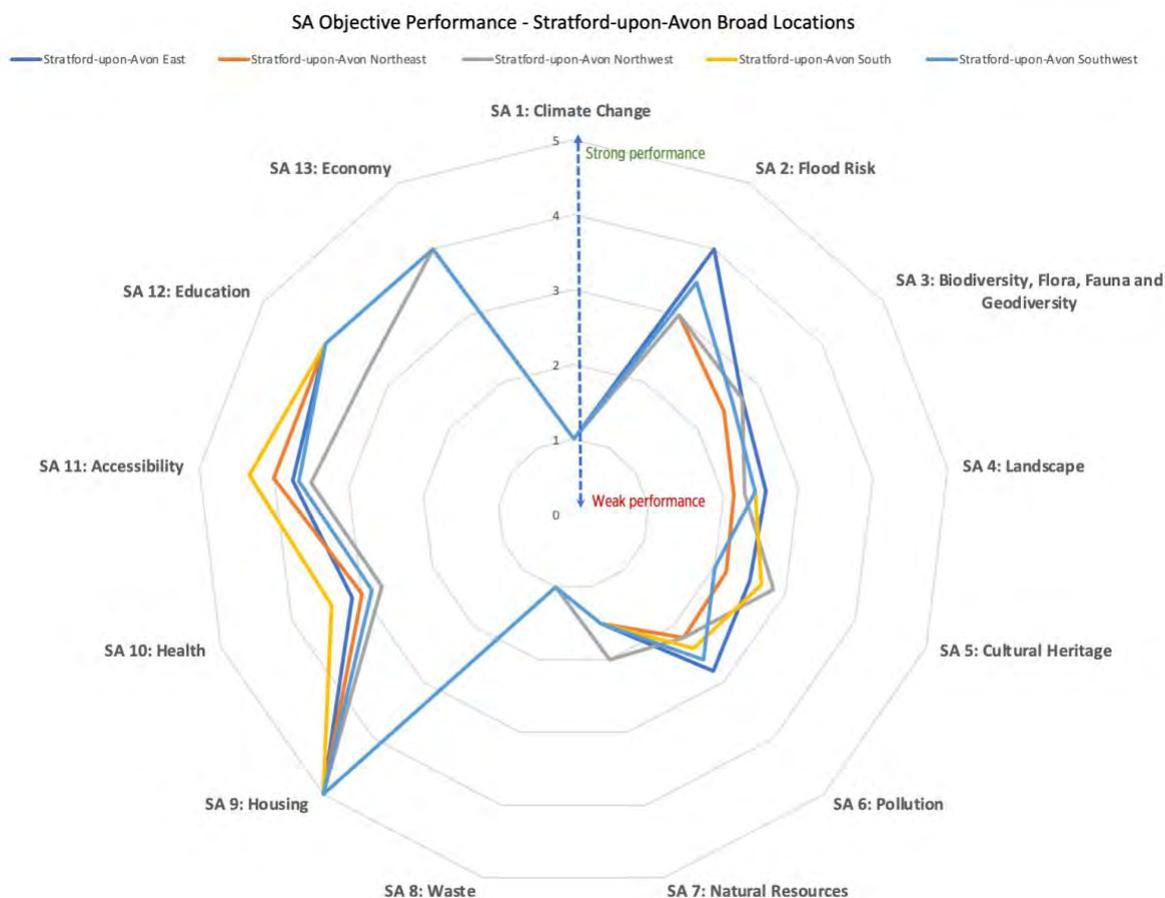
- 4.12.2 Southam performs well against SA Objective 13 performs due to all BLs having good access to employment opportunities. This would have a minor positive impact on residents and the local economy being within the sustainable target distance to various business and employment opportunities.
- 4.12.3 The impact of the BLs on employment floorspace provision is uncertain as they are planned on undeveloped land with no loss of current employment space, as well as potentially boosting the local economic centres.
- 4.12.4 Southam Southwest is the best performing BL, being the closest BL to various employment opportunities in Southam, with greater potential to positively impact the local economy easily. **Best performing BL: Southam Southwest**

4.13 Conclusion – Overall Rank

4.13.1 Southam West performs strongest in terms of access to existing services.

SOUTHAM	North east	North west	South east	South west
Climate change Reduce the SWLP authorities' contribution towards the causes of climate change.				
Flood risk Plan for anticipated levels of climate change.	Best			
Biodiversity and geodiversity Protect, enhance and manage biodiversity and geodiversity.			Best	
Landscape Protect, enhance and manage the quality and character of landscapes and townscapes.				Best
Cultural heritage Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Best			
Environmental Pollution Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.				
Natural resources Protect and conserve natural resources including soil, water and minerals.			Best	
Waste Reduce waste generation and disposal and support sustainable management of waste.				
Housing Provide affordable, high quality and environmentally sound housing for all.				
Human Health Safeguard and improve community health, safety and wellbeing.	=Best	=Best		
Accessibility Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.				=Best
Education Increase access to education and improve attainment to develop and maintain a skilled workforce.				Best
Economy Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.				Best

4.14 Stratford-upon-Avon



SA Objective 1: Climate Change

4.14.1 All BLs perform similarly against SA Objective 1. See **Section 4.3** for further commentary on the assessment of this objective.

SA Objective 2: Flood Risk

4.14.2 All BLs coincide with areas of high surface water flood risk. This can be effectively mitigated with SuDS. Also, small proportions of SuA Northeast, SuA Northwest, SuA South and SuA Southwest partially coincide with Flood Zone 3 which is a negligible impact in terms of flood risk as the low levels of coincidence within the BLs means the presence of Flood Zones can be mitigated by designing the layout of the BL so as to avoid the Flood Zones.

4.14.3 SuA East performs the best against flood risk due to the BL wholly coinciding with Flood Zone 1, meaning there will be no impact on flood risk in this BL. **Best performing BL: Stratford-upon-Avon East**

SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

4.14.4 All BLs coincide with Priority Habitats to varying degrees. Priority habitats not available for mapping include the network of hedgerows that cross all BLs. Biodiversity Net Gain strategies may be used to avoid no net loss. Veteran Tree data was not available and site visits would be helpful to collect further data.

- 4.14.5 SuA Southwest is located in close proximity to Racecourse Meadow SSSI introducing a potential minor adverse impact through urban edge effects associated with increased access, air pollution and disturbance to the meadow by dog walking. On a more precautionary basis, SuA South could possibly also affect the SSSI.
- 4.14.6 SuA Northwest located in close proximity to Ancient Woodland. Minor adverse impacts may be expected on these designated sites, however there is no direct public access and the woodland stands on rising land some way away from the edge of the BL. Nevertheless, sensitive layout and design of GI would help mitigate potential adverse effects.
- 4.14.7 SuA Northeast coincides with a Welcombe Hills LNR, and SuA Northwest is not far from the same LNR. A significant area of the LNR is coincident with the NE BL and mitigation would be complex and very likely require compensation habitat, larger in area, to be created elsewhere.
- 4.14.8 SuA Northeast, SuA Northwest, SuA South and SuA Southwest also coincide with LWSs, leading to major adverse impacts on these locally designated sites. These impacts can be mitigated through complete avoidance by way of suitable location and layout design of future proposals.
- 4.14.9 **All BLs are constrained in some way;** SoA North West and SoA East are probably the least constrained; both can comfortably avoid compromising the LWS (NW only) and Priority Habitats present.

SA Objective 4: Landscape

- 4.14.10 With the exception of SuA East, all BLs are likely to contribute to urban sprawl. Minor impacts are also likely to affect views from the existing PRoW network. However, there is a lack of PRoW in SuA Northwest and SuA East whilst SuA Northeast has paths and bridleways that connect with the Welcombe Hills Country Park including the Monarch's Way.
- 4.14.11 SuA Northeast is in close proximity to Welcombe Hills Country Park and minor adverse impacts could affect the present open air recreational experiences that can be had at the park including views out from the park.
- 4.14.12 Three BLs are coincident with landscape character areas that could be enhanced according to the 1993 Landscape Guidelines: SuA Northeast, South and Southwest. This implies that there is potentially some sort of capacity for change in these areas albeit that the emphasis should be on enhancement.
- 4.14.13 Landscape sensitivity is high at all of the BLs, apart from SuA East. These adverse impacts will be difficult to avoid. Partial mitigation may be achieved using greenspace and sensitive design in the developments. Additional surveys are required to understand latest sensitivity qualities at each BL (see **Chapter 12**). **Best performing BL: Stratford-upon-Avon East**

SA Objective 5: Cultural Heritage

- 4.14.14 SuA South and SuA Southwest are both in close proximity to a Grade I Listed Building representing a possible major impact on setting. SuA Northeast coincides with a Grade II* and is in proximity to another; this is likely to lead to major adverse effects. The same BL coincides with and is adjacent to various Grade II Listed Buildings.

- 4.14.15 Every BL is located within close proximity to a Grade II Listed Building, with Stratford-upon-Avon Southwest also located adjacent to an RPG which presents a minor adverse impact. These major and minor adverse impacts on the setting and location of these heritage assets can potentially be mitigated through appropriate location and layout design of the development. Major effects such as coincidence with heritage features are more challenging to resolve.
- 4.14.16 SuA East is located adjacent to or within very close proximity to 'Tiddington Roman Settlement' SM; a minor adverse effect could be expected which would require mitigation through design and layout.
- 4.14.17 SuA East, SuA Northeast, SuA South and SuA Southwest coincide or are located in close proximity to 'Clopton Bridge' CA. This will probably lead to minor adverse impacts on the setting of the CA. Minor adverse impacts on CAs and SMs could be mitigated through landscape-led design and avoidance through appropriate layout design of the development.
- 4.14.18 Stratford-upon-Avon Northwest a minor adverse on two Grade II Listed Buildings. **Best performing BL: Stratford-upon-Avon Northwest.**
- 4.14.19 A Heritage and Settlement Sensitivity Assessment has been undertaken which will provide further evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of Broad Locations.

SA Objective 6: Pollution

- 4.14.20 All BLs are likely to result increases in air pollution through increased traffic levels and vehicular travel. As the BLs have the capacity for up to 2,000 homes, an increase in local air pollution is possible. Further research is needed to confirm this.
- 4.14.21 All BLS either coincide or are very close to the AQMA. SuA Northeast, SuA Northwest and SuA South are also located in close proximity to a main road. SuA Northwest coincides with a railway line, with all leading to a minor adverse impact on air and noise pollution. Minor adverse impacts can be mitigated through the implementation of green buffers to improve air quality, as well as avoiding the impacts through the location and appropriate layout design of the development.
- 4.14.22 SuA Northwest, SuA South and SuA Southwest coincide with or are adjacent to a watercourse and SuA Northeast coincides with a Groundwater SPZ. Coincidences or developments adjacent to watercourses or SPZs may lead to the proposed developments polluting the watercourses but this can be effectively mitigated through the use of SuDS and GI to reduce the impact during the operation of the development. Stratford-upon-Avon is the best performing BL, coinciding with and located close to the lowest number of receptors, reducing the likely effects of pollution. **Best performing BL: Stratford-upon-Avon East**

SA Objective 7: Natural Resources

- 4.14.23 All BLs situated on previously undeveloped land and thus adversely impacting land with potential environmental qualities that provide ecosystem services and contribute to environmental capital. Previously undeveloped land would be lost with development and very likely represent an irreversible impact.

- 4.14.24 All BLs are primarily situated on BMV land including ALC Grade 3 land, which is assumed to be ALC Grade 3a as classification sub-division is not available. The loss of agricultural land and BMV soils is very difficult to mitigate or compensate, even with land being used for GI and soils, due to BMV soil loss being a long-term, permanent impact.
- 4.14.25 Stratford-upon-Avon Northwest is the best performing BL due to being the only BL in the settlement which does not coincide with an MSA. **Best performing BL: Stratford-upon-Avon Northwest**
- SA Objective 8: Waste*
- 4.14.26 See **Section 4.8**.
- SA Objective 9: Housing*
- 4.14.27 See **Section 4.9**.
- SA Objective 10: Health*
- 4.14.28 All BLs are located outside of the sustainable target distance of a hospital with an A&E facility. All BLs are also outside of the target distance for a leisure facility. SuA East, SuA Northeast, SuA Northwest and SuA Southwest will be outside the sustainable target distance to a GP surgery, meaning human wellbeing would be adversely impacted. This minor adverse impact can be mitigated through the increased provision of these services.
- 4.14.29 SuA East, Northeast and South are within the sustainable distance from a greenspace. All BLs are in the sustainable distance for PRoWs/Cycle Path Networks. SuA Northeast, SuA Northwest and SuA South are all within close proximity to main roads and all the BLs are within close proximity to an AQMA, with both presenting minor adverse impacts on air and noise pollution. Mitigation can be achieved by the implementation of green buffers around developments.
- 4.14.30 Stratford-upon-Avon South is the best performing BL in the settlement, being the only BL within the sustainable target distance of a GP surgery. **Best performing BL: Stratford-upon-Avon South**
- SA Objective 11: Accessibility*
- 4.14.31 SuA performs moderately against SA Objective 11. SuA Northeast, SuA Northwest, SuA South and SuA Southwest are located outside the sustainable target distance from a bus stop, and SuA East and SuA South are located outside the sustainable target distance from a railway station, resulting in minor adverse impacts expected on the site end users' access to public transport. Mitigation is possible through improvements to public transport provisions.
- 4.14.32 SuA East, SuA Northeast, SuA Northwest and SuA Southwest are located outside the sustainable target distance from a food store, presenting a minor adverse impact on access to food stores. Inclusion of food stores in the layout of future development would be expected to effectively mitigate the associated minor adverse impacts.
- 4.14.33 Stratford-upon-Avon Northeast is the best scoring BL with moderate connectivity to the wider plan area. Other BLs have very poor connectivity, which would lead to a major adverse impact on connectivity for site end users. **Best performing BL: Stratford-upon-Avon Northeast**

SA Objective 12: Education

- 4.14.34 All BLs are wholly within the target distance to post-16 (tertiary education) and primary education, representing a minor positive impact on site end users' access to these scales of education. Only Stratford Northwest does not have access to secondary education within the target distance.
- 4.14.35 **Best performing BL: Stratford-upon-Avon East, Northeast and South**

SA Objective 13: Economy

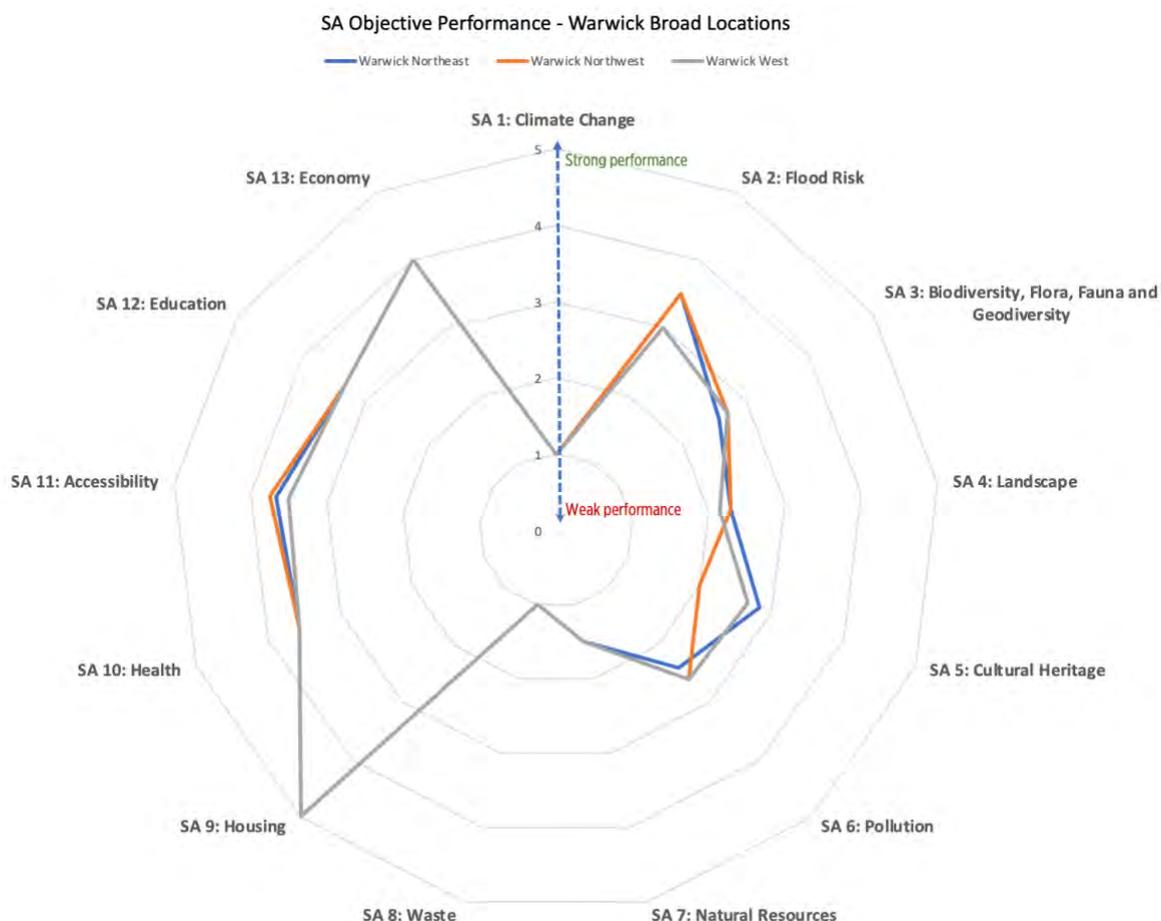
- 4.14.36 SuA performs well against SA Objective due to all BLs having good access to employment opportunities. This would have a minor positive impact on site end users and the local economy as it is within the sustainable target distance to various business opportunities.
- 4.14.37 The impact of the BLs on employment floorspace provision is uncertain as they are planned to be developed on undeveloped land, resulting in no loss of current employment space and potential to boost local economic centres.
- 4.14.38 Stratford-upon-Avon Northeast is the best performing BL, being closest to various employment opportunities in Stratford-upon-Avon, positively impacting the local economy most readily. **Best performing BL: Stratford-upon-Avon Northeast**

4.15 Conclusion – Overall Rank

4.15.1 Stratford-upon-Avon East is least constrained overall in terms of environmental receptors.

STRATFORD-upon-AVON	East	North east	North west	South	South west
Climate change Reduce the SWLP authorities' contribution towards the causes of climate change.					
Flood risk Plan for anticipated levels of climate change.	Best				
Biodiversity and geodiversity Protect, enhance and manage biodiversity and geodiversity.					
Landscape Protect, enhance and manage the quality and character of landscapes and townscapes.	Best				
Cultural heritage Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.			Best		
Environmental Pollution Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.	Best				
Natural resources Protect and conserve natural resources including soil, water and minerals.			Best		
Waste Reduce waste generation and disposal and support sustainable management of waste.					
Housing Provide affordable, high quality and environmentally sound housing for all.					
Human Health Safeguard and improve community health, safety and wellbeing.				Best	
Accessibility Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.		Best			
Education Increase access to education and improve attainment to develop and maintain a skilled workforce.	=Best	=Best		=Best	
Economy Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.		Best			

4.16 Warwick



SA Objective 1: Climate Change

- 4.16.1 All BLs perform similarly against SA Objective 1. See **Section 4.3** for further commentary on the assessment of this objective

SA Objective 2: Flood Risk

- 4.16.2 All BLs coinciding with small areas (less than 10%) of high surface water flood risk, presenting a negligible adverse impact on surface water flooding. This impact associated with flood risk can be mitigated with the use of SuDS. Also, small proportions of Warwick Northwest and Warwick West partially coincide with Flood Zone 3, which is a negligible impact in terms of flood risk. Due to the low levels of coincidence at the BLs, the Flood Zone can be avoided with effective design in the location and layout of the development.
- 4.16.3 Warwick Northeast performs best in terms of flood risk due to the BL wholly coinciding with Flood Zone 1, meaning there will be no expected impacts associated flood risk in this BL.
Best performing BL: Warwick Northeast

SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

- 4.16.4 Warwick performs reasonably well against SA Objective 3, with no SACs, SSSIs, NNRs, LNRs and LGSs within close proximity to any of the BLs. As a result, no adverse impacts on the biodiversity, flora, fauna, or geodiversity at these designated sites would be expected. All BLs coincide with priority habitats, as well as Warwick Northeast and Warwick West located in close proximity to Ancient Woodland, leading to possible adverse impacts..
- 4.16.5 All BLs coincide with LWSs, leading to major adverse impacts on the locally designated sites. To mitigate these impacts, avoidance or buffers may be used to minimise or remove associated adverse impacts. **Best performing BL: Warwick West**

SA Objective 4: Landscape

- 4.16.6 Warwick West would be likely to increase the risk of coalescence between ‘Warwick’ and ‘Hampton on the Hill’, with these minor adverse impacts being difficult to mitigate. Mitigation may be possible using greenspace in the developments or through creating a robust settlement edge.
- 4.16.7 Each will possibly lead to urban sprawl as all BLs are in open agricultural landscapes. Warwick West will have the least impact on views from PRoW.
- 4.16.8 The BLs lie in different character types and only Warwick West includes any landscape recommended for enhancement.
- 4.16.9 There is no landscape sensitivity data available. Additional surveys are required to understand latest sensitivity qualities at each BL (see **Chapter 12**). Desktop analysis of OS mapping and other sources suggests that Warwick West is perhaps the least sensitive as it is in close proximity to the M40 motorway. **Best performing BL: Warwick West**

SA Objective 5: Cultural Heritage

- 4.16.10 Warwick Northwest coincides with a Grade II* Listed Building; Warwick Northwest and Warwick West coincide with a Grade II Listed Building. Development at these BLs could lead to major adverse impacts to the heritage assets in question.
- 4.16.11 Warwick Northeast and Warwick West are both in proximity to Grade II Listed Buildings. A minor adverse impact on the setting of heritage features is likely. The identified adverse impacts can be mitigated through avoiding the heritage assets and introducing appropriate design of the location and layout of future developments. Mitigation for major impacts maybe more challenging and not always possible.
- 4.16.12 Warwick West is located in close proximity to a CA which could lead to a minor impact.
- 4.16.13 Warwick Northwest coincides with ‘Guys Cliffe’ RPG, causing a major adverse impact to the setting of this RPG.
- 4.16.14 Warwick Northeast is the best performing BL. It is in proximity to a Grade II Listed Building and only located in distant proximity to a Grade II* Listed Building. **Best performing BL: Warwick Northeast.**
- 4.16.15 A Heritage and Settlement Sensitivity Assessment has been undertaken which will provide further evidence to inform the appraisal of potential impacts on cultural heritage. The assessment was not available for use at the time of undertaking the assessment of Broad Locations.

SA Objective 6: Pollution

- 4.16.16 All BLs are likely to result increases in air pollution through increased traffic levels and vehicular travel. As the BLs have the capacity for up to 2,000 homes, an increase in local air pollution is possible. Further research is needed to confirm this.
- 4.16.17 All BLs are adjacent to watercourses including the 'Grand Union Canal' and River Avon, which may lead to proposed developments polluting the watercourses during their operation. This can be mitigated through the use of SuDS and GI to reduce the impact during the operation of the development.
- 4.16.18 All BLs are located within close proximity to a main road, which will lead to a minor adverse impact on air and noise pollution. Mitigation for air and noise pollution can be mitigated through the implementation of green buffers to improve air quality, as well as avoiding the impacts through the effective design and layout of the development.
- 4.16.19 All BLs perform very similarly against all SA Objective 6 receptors.

SA Objective 7: Natural Resources

- 4.16.20 All BLs situated on previously undeveloped land and thus adversely impacting land with potential environmental qualities that provide ecosystem services and contribute to environmental capital. Previously undeveloped land would be lost with development and very likely represent an irreversible impact.
- 4.16.21 All BLs are primarily situated on BMV land including ALC Grade 3 land, which is assumed to be ALC Grade 3a as classification sub-division is not available. The loss of agricultural land and BMV soils is very difficult to mitigate or compensate, even with land being used for GI and soils, due to BMV soil loss being a long-term, permanent impact.
- 4.16.22 Warwick West is the best performing site due to around half of the site area being covered by an MSA, with the majority of the other BLs' area wholly coinciding with it. **Best performing BL: Warwick West**

SA Objective 8: Waste

4.16.23

See **Section 4.8**.

SA Objective 9: Housing

4.16.24

See **Section 4.9**.

SA Objective 10: Health

- 4.16.25 All BLs are located within the sustainable target distance of a hospital with an A&E. Likewise for access to PRow/cycle path networks. All of which would lead to minor positive impacts on human health.
- 4.16.26 Only Warwick NW doesn't meet the sustainable target distance for access to a GP Surgery, whilst all BLs are outside of the target distance for leisure facilities, leading to minor adverse impacts on human health. This can be mitigated through improvements to sustainable access to public transport. Only Warwick West is in the target distance for greenspace.
- 4.16.27 All BLs coincide with main roads, which could lead to a minor adverse impact on health due to noise and air pollution. This can be mitigated through the implementation of green buffers to improve air quality.

- 4.16.28 Warwick West is the best performing BL, as just under half of the site area is located within the sustainable target distance to a GP Surgery, meaning less mitigation would be required for all site end users to have sustainable access to GP Surgeries. **Best performing BL: All equal.**

SA Objective 11: Accessibility

- 4.16.29 All Warwick BLs are situated inside of the sustainable target distance of a bus stop and a train station, which are both good factors for positive sustainability performance.
- 4.16.30 Only Warwick Northwest meets the target distance criteria for a local food shop. A minor adverse impact would be expected on accessibility to site end users requiring access to local services in the Northwest and Northwest BLs. However, this can be mitigated through public transport improvement schemes and the inclusion of food stores within development plans.
- 4.16.31 Connectivity is very poor in Warwick West predominantly ranking as Grade E, which will present a major adverse impact on transport for site end users. Poor connectivity can be mitigated through road and pedestrian and cycle network improvements, active travel provision and public transport improvement schemes. It should be noted here that connectivity data for Warwick Northeast was unavailable, therefore the impact of the site on connectivity to the wider plan area is uncertain. Warwick Northwest is the best scoring BL, only presenting a minor adverse impact on connectivity (Grade D) to the wider SWLP area. **Best performing BL: Warwick Northwest**

SA Objective 12: Education

- 4.16.32 All BLs are wholly within the target distance to post-16 (tertiary education) and primary education, representing a minor positive impact on site end users' access to these scales of education. Only Warwick Northeast has access to secondary education within the target distance. **Best performing BL: Warwick Northeast**

SA Objective 13: Economy

- 4.16.33 Warwick as a settlement performs well against SA Objective 13, due to all BLs having good access to employment opportunities. This would have a minor positive impact on the local economy as it is within the sustainable target distance to various business and employment opportunities. The impact of the BLs on employment floorspace provision is uncertain as they are planned to be developed on previously undeveloped land, resulting in no loss of current employment space and potential to boost local economic centres.
- 4.16.34 Warwick Northeast is the best performing BL, being the closest BL to various employment opportunities in Warwick and likely to positively impact the local economy most easily. However, all BLs are located within close proximity to a number of employment opportunities, so would also be likely to positively impact the local economy as well. **Best performing BL: Warwick Northeast**

4.17 Conclusion – Overall Rank

4.17.1 Warwick East and Warwick West both perform well overall.

WARWICK	North east	North west	West
Climate change Reduce the SWLP authorities' contribution towards the causes of climate change.			
Flood risk Plan for anticipated levels of climate change.	Best		
Biodiversity and geodiversity Protect, enhance and manage biodiversity and geodiversity.			Best
Landscape Protect, enhance and manage the quality and character of landscapes and townscapes.			Best
Cultural heritage Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Best		
Environmental Pollution Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.			
Natural resources Protect and conserve natural resources including soil, water and minerals.			Best
Waste Reduce waste generation and disposal and support sustainable management of waste.			
Housing Provide affordable, high quality and environmentally sound housing for all.			
Human Health Safeguard and improve community health, safety and wellbeing.	=Best	=Best	=Best
Accessibility Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.		Best	
Education Increase access to education and improve attainment to develop and maintain a skilled workforce.	Best		
Economy Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.	Best		

4.18 Quantitative analysis at the Broad Locations

4.18.1 Some receptors lend themselves to quantitative analysis. The following receptor information helps to demonstrate how the granularity of assessment can be improved with more detail. Other receptors, such as evaluating the setting of a listed building is qualitative and therefore harder to objectively rank.

ALC distribution across the Broad Locations

4.18.2 Nine BLs have more than 20 hectares of ALC Grade 2 land: Kenilworth North, Kenilworth Northeast, Kenilworth Southeast, RLS Northeast, RLS Northwest, Southeast, Shipston East, Stratford-upon-Avon East, Stratford-upon-Avon South.

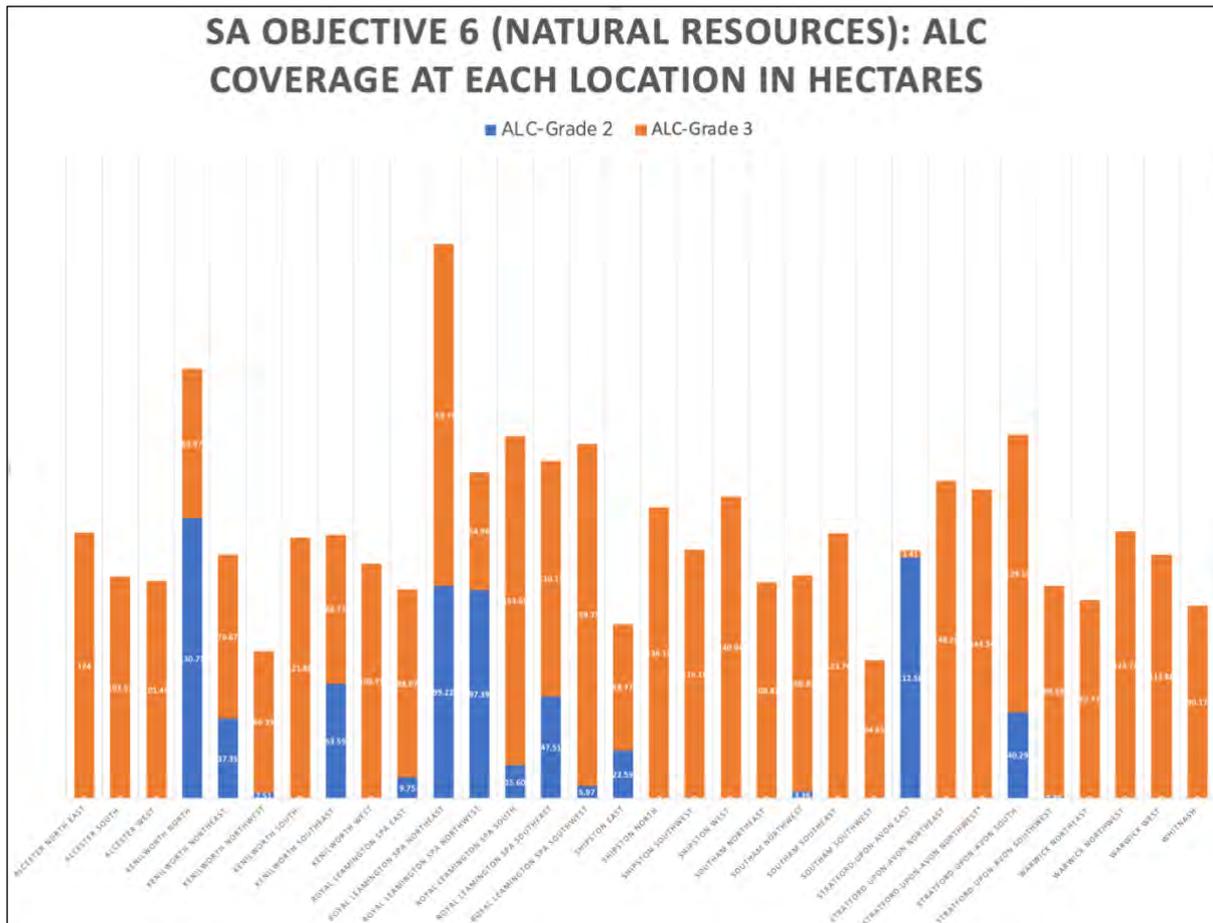


Figure 4.2: Agricultural Land Classification values for land at the Broad Locations expressed in hectares as part of each BL

Priority Habitat distribution across the Broad Locations

4.18.3 Priority habitats make up one of the key receptors that are used to help evaluate SA performance in terms of impacts that reasonable alternative broad locations might have on them. Most Broad Locations have low quantities of Priority Habitat which is possibly a reflection of the way in which lowland England is farmed. However, three locations have more than 20ha of Priority Habitat: RLS Southeast, Kenilworth SE and Kenilworth North (see **Figure 6.2**). Figure 6.3 illustrates the variation in priority habitat type that can be found across the BLs.

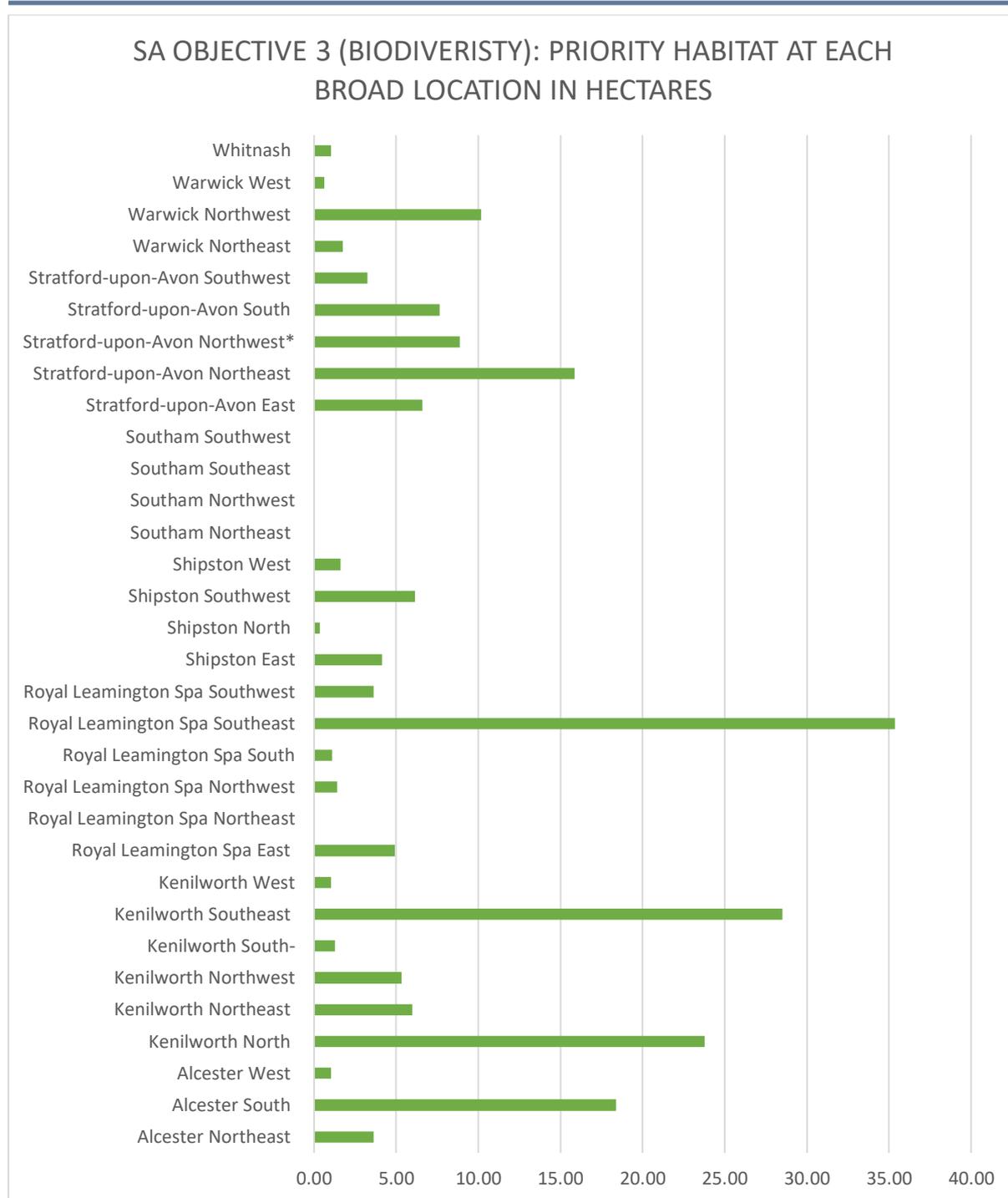


Figure 4.3: Broad Locations have differing quantities of Priority Habitat

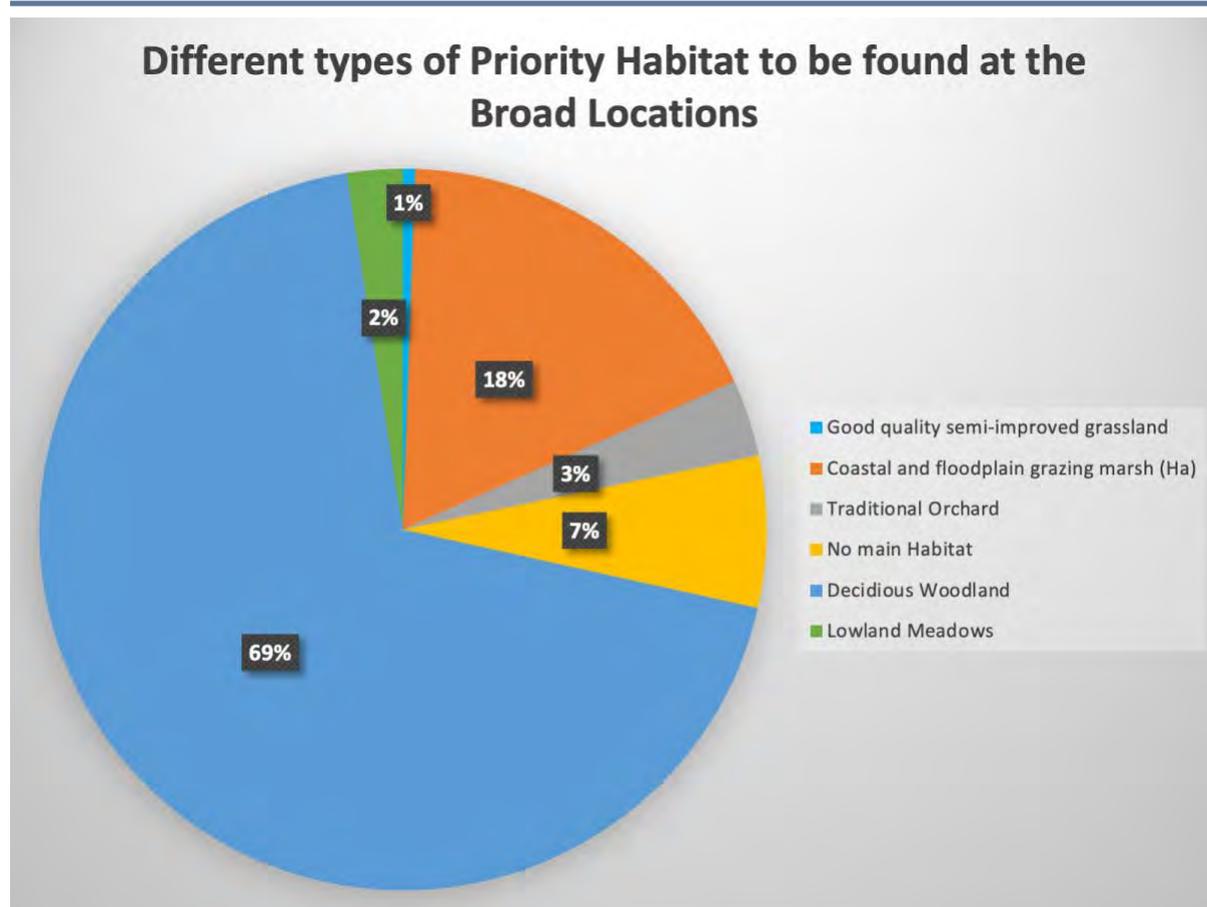


Figure 4.3: Different types of Priority Habitat to be found at the Broad Locations; a similar pattern could be expected for the Small Settlements.

4.19 Summary SA findings for the Broad Locations

4.19.1 **Table 4.1** summarises the assessment findings for the Broad Locations under each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A**. The assessment of each indicator cannot be 'added' to create an overall score as this would give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix B** of the Main Report provides detailed assessments of each indicator under each SA Objective.

Table 4.1: Summary findings for the Broad Locations

Broad Locations	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Alcester Northeast	-	0	-	-	-	-	-	-	++	-	-	+	+
Alcester South	-	0	-	-	-	-	-	-	++	-	-	+	+
Alcester West	-	0	-	-	-	-	-	-	++	-	-	+	+
Kenilworth North	-	+	-	-	-	-	-	-	++	-	++	+	+
Kenilworth Northeast	-	+	-	-	-	-	-	-	++	-	-	+	+
Kenilworth Northwest	-	+	-	-	-	-	-	-	++	-	-	-	+
Kenilworth South	-	0	-	-	-	-	-	-	++	-	+	-	+
Kenilworth Southeast	-	+	-	-	-	-	-	-	++	-	-	-	+
Kenilworth West	-	+	-	-	-	-	-	-	++	-	-	-	+
Royal Leamington Spa East	-	+	-	-	-	-	-	-	++	-	-	+	+
Royal Leamington Spa Northeast	-	+	-	-	-	-	-	-	++	-	-	+	+
Royal Leamington Spa Northwest	-	+	-	-	-	-	-	-	++	-	-	+	+
Royal Leamington Spa South	-	+	-	-	-	-	-	-	++	-	-	-	+
Royal Leamington Spa Southeast	-	+	-	-	-	-	-	-	++	++	+	+	+
Royal Leamington Spa Southwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Shipston East	-	0	-	-	-	-	-	-	++	-	-	-	+
Shipston North	-	+	-	-	-	-	-	-	++	-	-	-	+
Shipston Southwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Shipston West	-	+	-	-	-	-	-	-	++	-	-	-	+
Southam Northeast	-	0	-	-	-	-	-	-	++	-	-	+	+
Southam Northwest	-	0	-	-	-	-	-	-	++	-	-	+	+
Southam Southeast	-	0	-	-	-	-	-	-	++	-	-	+	+
Southam Southwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Stratford-upon-Avon East	-	+	-	-	-	-	-	-	++	-	-	+	+
Stratford-upon-Avon Northeast	-	0	-	-	-	-	-	-	++	-	++	+	+
Stratford-upon-Avon Northwest	-	0	-	-	-	-	-	-	++	-	-	-	+
Stratford-upon-Avon South	-	+	-	-	-	-	-	-	++	-	++	+	+
Stratford-upon-Avon Southwest	-	+	-	-	-	-	-	-	++	-	-	+	+
Warwick Northeast	-	+	-	-	-	-	-	-	++	-	-	-	+
Warwick Northwest	-	+	-	-	-	-	-	-	++	-	-	-	+
Warwick West	-	0	-	-	-	-	-	-	++	-	-	-	+
Whitnash	-	+	-	-	-	-	-	-	++	-	-	+	+

5 Evaluation of Small Settlement Locations

5.1 The 22 Small Selection Locations

5.1.1 Reasonable alternative development locations have been identified around the following small settlements:

- Barford
- Bearley
- Bidford
- Bishop's Tachbrook
- Claverdon
- Cubbington
- Earlswood
- Hampton Magna
- Hatton Park
- Hatton Station
- Henley
- Kineton
- Kingswood
- Long Itchington
- Radford Semele
- Salford Priors
- South Coventry
- Studley
- Wellesbourne
- Wilmcote
- Wood End
- Wootton Waven

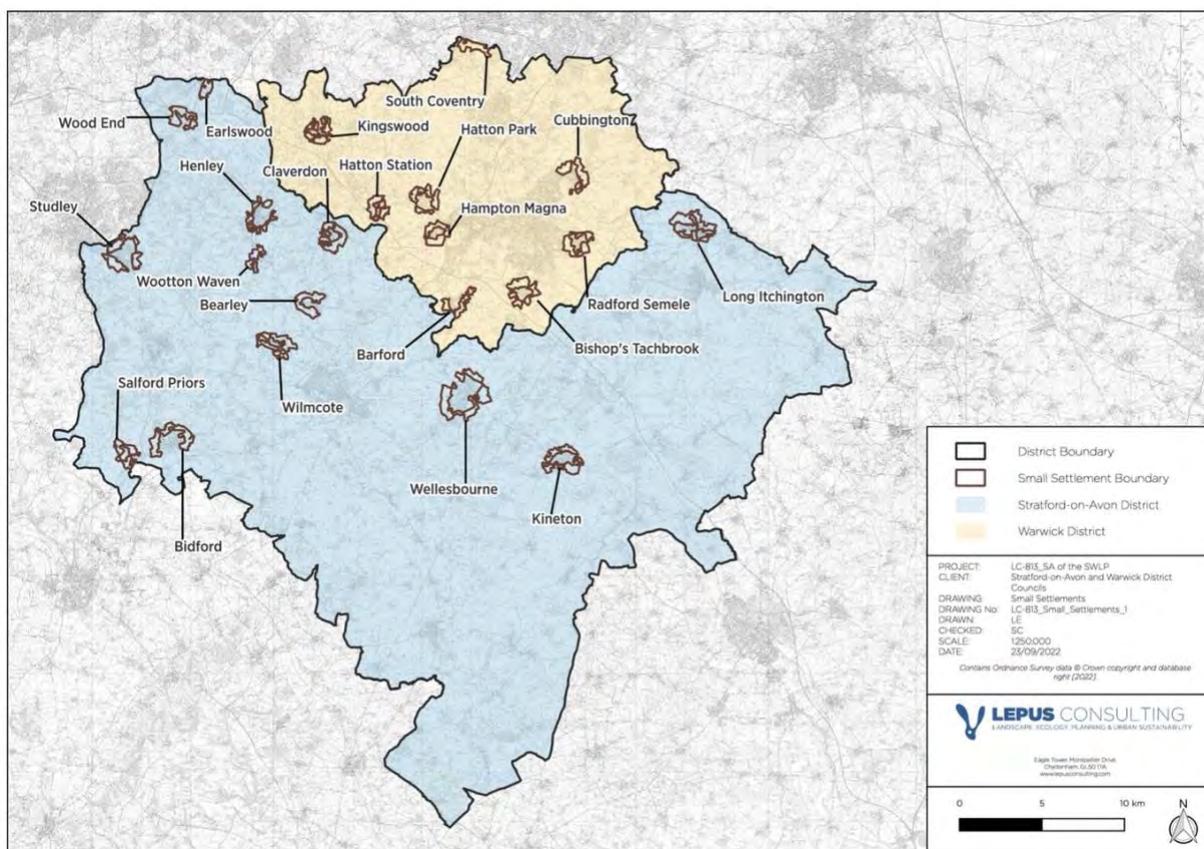


Figure 5.1: Stratford-on-Avon District Council and Warwick District Council administrative boundaries and reasonable alternative small settlement locations for development

5.1.2 The following sections discuss how the different Small Settlement Location perform in terms of each SA Objective.

5.2 Technical data

5.2.1 **Appendix C** provides an appraisal of the 22 Small Settlement Locations. Each reasonable alternative has been assessed for likely impacts against the 13 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in the tables within each SA Objective, in accordance with the methodology set out in **Chapter 2**.

5.3 SA Objective 1: Climate Change

5.3.1 At this stage in the plan making process the number of dwellings to be provided at each Small Settlement Location is unknown. However, for the purpose of this assessment it is assumed that a maximum of 500 new dwellings could be provided at each location.

5.3.2 The delivery of additional homes through the SWLP is likely to lead to an increase in Greenhouse Gas (GHG) emissions. Adopting a precautionary approach, and assuming a maximum of 500 homes at each location, an increase in more than 129 dwellings in Warwick District and / or more than 63 dwellings in Stratford-upon-Avon District would result in a 0.1% increase in carbon dioxide emissions in comparison to current levels. Should this scale of development come forward at any location it would result in a minor adverse effect prior to implementation of mitigation. All small settlement locations perform similarly and will lead to significant adverse effects on climate change when measured against this coarse metric.

5.3.3 The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging the use of active and public transport. This would in turn lead to a reduction in transport related GHG emissions. In addition, the SWLP will seek to make further reductions in GHG emissions through the adoption of energy efficiency and high sustainability standards for buildings to minimise carbon emissions.

5.3.4 Mitigation may be achieved by future policies in the SWLP which will seek to reduce GHG emissions associated with the construction and operation of homes. Impacts can be reduced by implementing low carbon building processes and, materials and operational consideration e.g. Passivhaus; Renewable energy; Modular housing. Higher density developments can make destinations easily accessible by walking or cycling and can bring people together to support local public transport, facilities and local services. Integrated active travel which maximises people's travel choices for low-carbon modes of transport like rail, bus, other public transport, walking and cycling is essential.

5.3.5 Support for decentralised, low carbon and renewable energy generation whether on site or standalone renewable energy generation sites will help reduce GHG emissions in the medium and long term.

5.3.6 The SWLP climate change study is currently being undertaken and is likely to provide further evidence to assist with the sustainability appraisal process.

Best and worst performing options

5.3.7 All small settlement locations would be expected to perform in the same manner in relation to climate change. Consequently, there is no definitive best or worst performing site. Small settlements with a smaller area would have less capacity for development, therefore would be expected to contribute less to climate change than a larger site would.

5.4 SA Objective 2: Flood Risk

- 5.4.1 SA Objective 2 aims to avoid locating development within areas at risk of fluvial or surface water flooding. All small settlement locations are coincident with an area classed as being at high risk of surface water flood flooding. The total proportion of each potential location coincident with an area at high risk of surface water flooding however varies for each location. The total area at risk is less than 10% of the overall site area for all small settlement locations. Therefore, all small settlement locations score similarly against this SA objective, scoring a negligible impact. Surface water flood risk can be mitigated effectively at a local scale through sensitive site design and the incorporation of features such as Sustainable Urban Drainage Systems (SuDS), which will seek to keep runoff to 'greenfield runoff' rates. The incorporation of such features will be promoted through SWLP policy.
- 5.4.2 Whilst the majority of small settlement locations are coincident with a proportion of land designated within Flood Zones 2 and / or 3, the extent of this varies between locations. In all but six small settlement locations, the proportion of the overall site coincidence accounts for less than 10% of the total area and therefore a negligible impact would be expected. The Small Settlement Location at Henley-in-Arden is coincident with a larger area of land designated within Flood Zone 2 (more than 50% of the total site area) and therefore a minor adverse effect would be expected.
- 5.4.3 The impact of flooding can be mitigated through the sensitive design and layout of development within a site, seeking to avoid Flood Zones 2 and 3.

Best and worst performing options

- 5.4.4 The five best performing small settlement locations are those which wholly coincide with Flood Zone 1 and would therefore have a positive impact on flood risk, as listed below:
- Bearley⁸⁹;
 - Claverdon;
 - Earlswood;
 - Hampton Magna; and
 - South Coventry.
- 5.4.5 There is no clearly worst performing small settlement in relation to flood risk. All locations aside from the five best performing as previously listed would be expected to have a negligible effect in terms of flood risk.

5.5 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

- 5.5.1 International, national and local biodiversity designations protect a network of important habitats and species across the Plan area. Potential impacts associated with development at the preferred locations will vary depending on the location, nature and scale of development. However, in all case it may include the loss or degradation of designated and supporting habitat.

⁸⁹ Note: small settlement locations are listed alphabetically rather than ranked in order of performance.

- 5.5.2 Habitats sites have the highest level of statutory protection. None of the small settlement locations are coincident with, or in close proximity to, a Habitats site. However, the HRA Report prepared to support the Issues and Options consultation (Lepus, 2022) has identified a number of potential likely significant hydrological⁹⁰ and recreational⁹¹ pathways of impact. It has also identified the presence of potentially functionally linked watercourses within the Plan area. These watercourses are associated with the Severn Estuary and Humber Estuary designations (Special Area of Conservation (SAC) and Ramsar sites), and are particularly important for a number of species of qualifying fish. The potential impact of the SWLP and possible mitigation required will be addressed in more detail through the HRA process. Therefore, at present this impact has been assessed as being uncertain across all small settlement locations.
- 5.5.3 There are no National Nature Reserves (NNRs) located within the Plan area and as such all small settlement locations would have a negligible impact upon these features.
- 5.5.4 As illustrated in **Box 5.1**, three small settlement locations are situated immediately adjacently to a designated Site of Special Scientific Interest (SSSI) (around Bearley, Wilmcote and Wood End) and five are located in close proximity to a SSSI. Development at these locations would have the potential to result in major and/or minor adverse effects.
- 5.5.5 Twelve of the small settlement locations are situated in close proximity to an area of ancient woodland and therefore would have the potential for a minor adverse effect. This may include increased recreational pressures from development, urbanisation impacts, air quality and hydrology impacts.
- 5.5.6 The assessment undertaken has indicated that all small settlement locations coincide with, or are located within close proximity to, a Local Wildlife Site (LWS) which would result in a potential minor adverse effect.
- 5.5.7 As illustrated in **Box 5.1**, 19 small settlement locations coincide with areas of Priority Habitat which would result in potential minor adverse effects. One location, Studley, is coincident with a Local Geological Site (LGS), which would be expected to lead to a minor adverse effect upon protected geological sites.
- 5.5.8 Mitigation which could be adopted at these locations should follow the mitigation hierarchy and may include the avoidance of biodiversity assets and mitigation of impacts through sensitive site selection, design and layout of development. In particular, any development located adjacent to a SSSI would need to ensure there would be no direct or indirect impacts on its features and be sensitively designed to create and enhance the natural environment.
- 5.5.9 Incorporation of green and blue infrastructure into development, and protection and integration of new planting with the Local Nature Recovery Network would help to protect and strength the biodiversity resource across the plan and wider area. Such works would create important stepping-stones between protected international, national and local sites. This would also have benefits for delivery of Biodiversity Net Gain and ensure biodiversity receptors are more robust to impacts associated with development and climate change.

⁹⁰ LSEs at the Severn Estuary Special Area of Conservation (SAC), Severn Estuary Special Protection Area (SPA) and Severn Estuary Ramsar, Humber Estuary SAC, Humber Estuary SPA, Humber Estuary Ramsar and Oxford Meadows SAC.

⁹¹ LSEs at Bredon Hill SAC.

Best and worst performing options

5.5.10 All of the small settlement locations have the potential to have adverse impacts on biodiversity receptors and there are no readily identifiable Best Performing Options. Bishop's Tachbrook would be expected to require the least in terms of mitigation. Locations at Bearley, Wilmcote and Wood End have been assessed as having potential adverse impacts on SSSIs as well as Ancient Woodland, Local Wildlife Sites and Priority Habitats and therefore are the worst performing under this SA Objective.

Box 5.1: Summary of potential biodiversity receptors

<p>Small settlement locations that are adjacent to a SSSI:</p> <ul style="list-style-type: none"> - Bearley - Wilmcote - Wood End 	<p>Small settlement locations which coincide with Priority Habitats:</p> <ul style="list-style-type: none"> - Barford - Bearley - Bidford - Claverdon - Earlswood - Hatton Park - Hatton Station - Henley - Kineton - Kingswood - Long Itchington - Radford Semele - Salford Priors - South Coventry - Studley - Wellesbourne - Wilmcote - Wood End - Wootton Wawen 	<p>Small settlement locations which are located close to areas of Ancient Woodland:</p> <ul style="list-style-type: none"> - Bearley - Claverdon - Cubbington - Hampton Magna - Hatton Park - Henley - Long Itchington - South Coventry - Studley - Wellesbourne - Wilmcote - Wood End
<p>Small settlement locations that are in close proximity to a SSSI:</p> <ul style="list-style-type: none"> - Claverdon - Earlswood - Kineton - Studley - Wellesbourne 		

5.6 SA Objective 4: Landscape

5.6.1 Landscape sensitivity studies undertaken to support the Stratford-on-Avon Core Strategy and evaluation desktop evidence, which is naturally limiting, and field work is necessary to complete these assessments. The assessments show that all small settlement locations are within areas of high or high-medium landscape sensitivity and that new development would therefore result in a major adverse effect.

5.6.2 In terms of landscape character, all small settlement locations are in an area where new development could potentially be discordant with the character areas, guidelines and characteristics as set out in the 1993 Warwickshire Landscape Guidelines (see **Section 2.8**).

5.6.3 Special Landscape Areas (SLAs) comprise areas identified as being of particularly high quality countryside, based on their landscape and scenic quality, as well as natural and historic features. SLA designations apply to SSLs within Stratford-on-Avon only. Twelve of the small settlement locations coincide with a SLAs (see **Box 5.2**). Any future development within these SLAs should respect the character of the landscape and built form and address potential impacts on visual amenity from more sensitive receptors.

5.6.4 A total of seven of the 22 small settlement locations (**Box 5.2**) are likely to result in coalescence with neighbouring small settlements and towns. The impact of any future development should therefore seek to mitigate increased risks of urban sprawl through design of development to create a robust settlement edge and a gentle urban-rural transition.

Best and worst performing options

5.6.5 All small settlement Locations have been assessed as being within sensitive landscapes and have the potential to adversely impact the landscape. Locations identified in Box 5.2 as having potential to cause coalescence between settlements perform worse than other options. The location at Kineton has the potential to also adversely impact the Cotswolds AONB and therefore this location is worst performing overall.

Box 5.2: Summary of potential landscape receptors

<p>Small settlement locations with potential to coalesce:</p> <ul style="list-style-type: none"> - Bidford - Bishop's Tachbrook - Hampton Magna - Hatton Park - Radford Semele - South Coventry - Studley 	<p>Small Settlement Locations that coincide with, are adjacent to or are in proximity to a Special Landscape Area:</p> <ul style="list-style-type: none"> - Bearley - Bidford - Claverdon - Earlswood - Hatton Station - Henley - Kineton - Studley - Wellesbourne - Wincote - Wood End - Wootton Wawen
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5.7 SA Objective 5: Cultural Heritage

5.7.1 Eight of the 22 small settlement locations are situated within close proximity to a Grade I Listed Building, ten within proximity to a Grade II* Listed Building and all locations are either coincident with or in close proximity to a Grade II Listed Building (see **Box 5.3**). Eleven of the small settlement locations either coincide with or are located within proximity to a Scheduled Monument (SM).

5.7.2 There is potential for adverse effects upon Listed Buildings and SMs as a consequence of development. Further information is required as the SWLP develops to clarify the significance of heritage features and potential impacts on significance from development. The Councils are therefore preparing a document to review the significance of heritage assets and potential impacts on significance as a consequence of the SWLP. However, given the extensive nature of the area of search it is possible that potential adverse effects on heritage could be mitigated through avoidance.

5.7.3 Ten of the Small Settlement Locations either coincide with, or are adjacent to, a Conservation Area (**Box 5.3**). Three of the small settlement locations, Bishop’s Tachbrook, Kingswood and Wellesbourne either coincide with, or are adjacent to a Registered Parks and Gardens and one site, Kineton, coincides with a Registered Battlefield. Potential adverse effects could be avoided through sensitive site selection, layout and design of future development.

Best and worst performing options

5.7.4 All small settlement Locations have been identified as having potential adverse impacts on heritage assets. The locations at Radford Semele and Wood End have been identified as potentially having adverse impacts on Grade II Listed Buildings and no other known heritage receptors and are therefore the Best Performing Options at this stage. The Location at Kineton has the potential to have adverse impacts on Grade II* Listed Buildings, Grade II Listed Buildings, Conservation Area and Scheduled Monument, as well as being located within a Registered Battlefield and is therefore the worst performing at this stage.

Box 5.3: Summary of potential cultural heritage receptors

<p>Small settlement locations that either coincide with, are adjacent to or in proximity to a Grade I Listed Building:</p> <ul style="list-style-type: none"> - Bidford - Bishop’s Tachbrook - Cubbington - Henley - Salford Priors - Wellesbourne - Wilmcote - Wootton Wawen 	<p>Small settlement locations that either coincide, adjacent to or in proximity to a Grade II* Listed Building:</p> <ul style="list-style-type: none"> - Barford - Claverdon - Hampton Magna - Hatton Park - Hatton Station - Henley - Kineton - Long Itchington - Studley - Wellesbourne - Wootton Wawen
<p>Small settlement locations that coincide with/are adjacent to a Conservation Area:</p> <ul style="list-style-type: none"> - Bearley - Bidford - Claverdon - Henley 	<p>Small settlement locations that coincide with/are located in close proximity to a Scheduled Monument:</p> <ul style="list-style-type: none"> - Barford - Bidford - Earlswood - Hatton Station

- Kineton	- Henley
- Long Itchington	- Kineton
- Salford Priors	- Salford Priors
- Wellesbourne	- South Coventry
- Wilmcote	- Studley
- Wootton Wawen	- Wellesbourne
	- Wootton Wawen

5.8 SA Objective 6: Environmental Pollution

5.8.1 SA Objective 6 looks at a number of pathways of pollution (e.g. a change in air quality) and also receptors to pollution (e.g. future residents, habitats and watercourses). South Coventry is the only location which is located within an AQMA (the Coventry City-Wide AQMA). Hampton Magna is the only location which is coincident with a groundwater SPZ, with the south west section of this location being coincident with a SPZ 1, 2 and 3. A number of small settlement locations lie close to either a main road and / or a railway line. These features pose a potential source of noise and air quality pollution and vibration for future residents. Future development (both through construction and operational phases of development) has the potential to impact upon watercourses which flow within close proximity to some of the small settlement locations through contamination of surface water run-off.

5.8.2 At this stage of SWLP preparation process, it is assumed that potential pollution impacts can be mitigated through avoidance and mitigation. This could be achieved through the adoption of strong policy wording around the protection of water (for example incorporation of SuDS and the protection of Good Ecological Status) and protection of air quality, alongside the sensitive design and layout of buildings, implementation of principles such as those associated with '20-minute neighbourhoods' and the promotion of active and sustainable transport choices which will reduce traffic related emissions to air and noise.

Best and worst performing options

5.8.3 Small settlements Cubbington and Earlswood are the only locations which have been assessed as having a negligible impact on pollution. Therefore, these are the two best performing options. Hampton Magna is the worst performing site, with adverse impacts expected in relation to proximity to main roads, railway lines, effects on watercourse quality and GPZs.

Box 5.4: Summary of potential pollution receptors

Small settlement locations in proximity to a main road:	Small settlement locations in proximity to a railway line:	Small settlement locations that coincide with a watercourse:
- Barford	- Bearley	- Barford
- Bearley	- Hampton Magna	- Bidford
- Bishop's Tachbrook	- Hatton Park	- Bishop's Tachbrook
- Claverdon	- Hatton Station	- Hampton Magna
- Cubbington	- Henley	- Hatton Park
- Hampton Magna	- Kingswood	- Hatton Station
- Hatton Park	- Wilmcote	- Henley

- Hatton Station	- Wood End	- Kineton
- Henley	- Wootton Wawen	- Kingswood
- Long Itchington		- Long Itchington
- Radford Semele		- Radford Semele
- Salford Priors		- Salford Priors
- Studley		- Studley
- Wellesbourne		- Wellesbourne
- Wood End		- Wilmcote
- Wootton Wawen		- Wood End
		- Wootton Wawen

5.9 SA Objective 7: Natural Resources

5.9.1 SA Objective 7 looks at potential impacts upon natural resources at each potential location. These include impacts upon agricultural land and mineral safeguarded areas.

5.9.2 All the small settlement locations include some area of land classified as ALC Grade 3 or higher⁹². The loss of more than 20ha of Best and Most Versatile (BMV) land would be assessed as a major adverse impact on natural resources. This impact cannot be readily mitigated. All small settlement locations would result in the loss of 20ha or more of BML and would therefore have a major adverse effect. The scale of this impact is reflected in the criteria for selection of locations i.e. on greenfield sites.

5.9.3 All small settlement locations, with the exception of South Coventry, coincide with a Mineral Safeguarding Area (MSA).

5.9.4 The strongest performing potential location against SA Objective 7 is South Coventry due to its location outside an MSA, however it is noted that it is located on land graded as ALC Grade 2, with smaller areas on ALC Grade 3 which would result in a major adverse effect.

Best and worst performing options

5.9.5 All small settlements perform similarly against Natural Resources, with the exception of South Coventry, which is the only location that does not coincide with a Mineral Safeguarding Area. South Coventry is therefore the best performing small settlement, with no clear worst performing small settlement.

⁹² Measuring on a scale one to five, if a piece of land is graded as ALC Grade 1 it has the optimal quality of agricultural land, with ALC Grade 5 being the poorest quality of agricultural land.

5.10 SA Objective 8: Waste

5.10.1 SA Objective 8 focuses on the potential for each location to increase household waste generation as a result of development. Similarly to climate change, at this stage in the plan making process the number of dwellings to be provided at each potential location is unknown. However, for the purpose of this assessment it is assumed that a maximum of 500 new dwellings could be provided at each location. As such it is likely that all locations could potentially increase household waste generation by more than 0.1% in comparison to current levels across the plan area. This would result in a minor adverse effect for all small settlement locations. This impact could be mitigated through promotion of recycling and reuse schemes and the appropriate provision of recycling storage facilities to meet the scale of growth set out in the SWLP.

5.10.2 To determine the best performing potential location, consideration has been given to existing waste infrastructure which may be able to accommodate future growth. Locations such as South Coventry, Radford Semele, Cubbington, Hampton Magna, Bishop's Tachbrook, Studley and Hatton Park are located in close proximity to larger settlements such as Coventry, Redditch and Leamington Spa, are likely to be able to deal with waste more effectively through existing provisions and upgrades.

Best and worst performing options

5.10.3 All small settlements perform similarly against waste, with no clear best or worst performing locations.

5.11 SA Objective 9: Housing

5.11.1 The measure for SA Objective 9 is the ability of each potential location to impact upon current housing provision and to also deliver a net gain in housing. This element of the assessment reflects the UK's current housing crisis, delivery of more houses would therefore result in a more positive impact.

5.11.2 The total number of houses to be built at each potential location is currently unknown but for the purposes of this assessment taken to be approximately 50-500 houses per location. On this basis it can be concluded that all locations have the potential to have a significant positive impact upon housing delivery.

Best and worst performing options

5.11.3 All small settlements perform similarly against housing, with no clear best or worst performing location.

5.12 SA Objective 10: Health

5.12.1 SA Objective 10 focuses on accessibility to important health facilities such as GPs, hospitals and greenspaces for new residents, alongside the proximity of potential sources of pollution which may have an adverse effect upon human health (such as roads which may increase traffic related atmospheric and noise pollution).

5.12.2 Barford, Bishop's Tachbrook, Hampton Magna, Hatton Park, and Studley are the only small settlement locations to either partially or mostly meet the sustainable travel access target distance of a hospital with an A&E department.

- 5.12.3 Half of the small settlement locations are within the sustainable target distance of a GP surgery: Bidford, Bishop's Tachbrook, Claverdon, Hampton Magna, Henley, Kineton, Kingswood, Radford Semele, Studley, Wellesbourne and Wood End.
- 5.12.4 Radford Semele, Studley and Wellesbourne are the only small settlement locations within the sustainable target distance for access to leisure facilities.
- 5.12.5 Mitigation to improve access to these key health facilities and services at new development may include the provision of active travel choices and improved links to sustainable transport options.
- 5.12.6 An AQMA is declared for an area where local air quality is unlikely to meet the Government's national air quality objectives for human health. Delivery of new development close to an AQMA, or other sources of air pollution such as roads, may have adverse effects upon the health of new residents. All the locations, with the exception of South Coventry, are located more than 200m away from an AQMA. A number of the small settlement locations are situated within 200m of a main road. Air quality impacts upon human health can be mitigated through strong policy wording in the SWLP around traffic and air quality and the sensitive design and layout of sites to include facilities for alternative sustainable modes of transport, active travel corridors and incorporation of GI to enhance air quality.
- 5.12.7 In addition to reducing reliance on the private car, the promotion of active travel routes can have a knock-on positive impact upon human health and wellbeing. All small settlement locations are situated within target distances of the existing PRoW and cycle networks. Access to greenspace is an important consideration for the health and wellbeing of future residents in terms of connecting people with nature and allowing for outdoor exercise. All small settlement locations, with the exception of Bearley and Hatton Station, lie within the target distance for greenspace. Whilst within the target distance for greenspace, Bidford, Henley, Studley and Wood End are coincident with existing greenspace and therefore score negatively as this would result in the loss of the existing greenspace.

Best and worst performing options

- 5.12.8 There is considerable variation in the performance of the small settlements against the health objective. The best performing small settlement is Studley, with positive impacts expected for sustainable access to NHS hospitals with A&E departments, GP surgeries, leisure facilities, greenspace and PRoW and cycle networks. The worst performing small settlement is Hatton Station, with a positive impact expected for access to the PRoW and cycle network only.

5.13 SA Objective 11: Accessibility

- 5.13.1 SA Objective 11 looks at accessibility to sustainable and active travel options for new residents and proximity and connectivity to existing settlements and services. The assessment has drawn on the South Warwickshire Settlement Analysis⁹³, which assesses presence of active travel and existing road network links, and any 'barriers' to movement, in relation to each location.

⁹³ South Warwickshire Councils (2022) 'South Warwickshire Settlement Analysis'

- 5.13.2 All small settlement locations perform very well in terms of access to a bus stop with a mixture of major and minor positive benefits having been identified. Twelve SSLs are likely to have a major positive effect on travel by train since the majority of the SSL is coincident with the 2km sustainability zone for train stations. However, nine locations lie outside of the train station zone and consequently are likely to perform less effectively overall in terms of sustainability.
- 5.13.3 The Councils' Settlement Analysis shows a mixed performance of small settlement locations, with Wootton Wawen having excellent connectivity and South Coventry and Studley having good connectivity.
- 5.13.4 The following small settlement locations were shown to have poor connectivity:
- Barford
 - Bearley
 - Claverdon
 - Hatton Park
 - Hatton Station
 - Henley
 - Long Itchington
 - Radford Semele
 - Wellesbourne
 - Wilmcote
- 5.13.5 Mitigation to improve connectivity could be provided at those small settlement locations outside target distances for sustainable transport options and those shown through the Council's study to be poorly connected to services and facilities. This may include the provision of improved active and public transport links to key services and facilities. Depending on the scale of development, there may be the potential to incorporate some smaller scale facilities within site design.

Best and worst performing options

- 5.13.6 There is variation in the performance of the small settlements in relation to accessibility. The best performing small settlement is Wootton Wawen, with positive impacts expected on access to a railway station, bus stops with regular services and food stores, as well as good connectivity to the existing settlement. The worst performing small settlement is Barford, with good access to a bus stop with regular services only and poor access to all other indicators within SA Objective 11.

5.14 SA Objective 12: Education

- 5.14.1 SA Objective 12 looks at accessibility to primary, secondary and further education provision for new residents. It must be stated that although distances to relevant educational provisions have been established, the scoring does not factor in current or future capacities of these educational provisions. This may result in a SSL being within the target distance to an educational provision, but this educational provision having an inadequate capacity to provide for the SSL in question.

- 5.14.2 Seventeen of all small settlement locations are located within the sustainable target distance for a primary school and 13 within the target distance for tertiary education (see **Box 5.5**). Development at these small settlement locations has therefore been assessed as having a minor positive impact due to the accessibility of educational facilities. All locations, with the exception of Henley, Kineton, Radford Semele Studley and Wood End, are situated outside the target distance of a secondary school and therefore a minor adverse effect in terms of accessibility is expected. Kineton and Radford Semele are the best performing options in terms of accessibility to educational facilities, both being within sustainable target distances of all three levels of educational provision.
- 5.14.3 Where access is limited, mitigation could be provided to improve active and public transport links to educational options.

Best and worst performing options

- 5.14.4 There is variation in the performance of the small settlements in relation to access to education. The two best performing locations are Kineton and Radford Semele, with both small settlements having good sustainable access to primary, secondary and tertiary education. The two worst performing locations are Earlswood and South Coventry, with both having poor access to all types of education provision.

Box 5.5: Small settlement locations within target distances of primary, secondary and further education

Small settlement locations within the target distance to primary schools:	Small settlement locations within the target distance to secondary schools:	Small settlement locations within the target distance to further education:
<ul style="list-style-type: none"> • Barford • Bidford • Bishops Tachbrook • Claverdon • Cubbington • Hampton Magna • Henley • Kineton • Kingswood • Long Itchington • Radford Semele • Salford Priors • Studley • Wellesbourne • Wilmcote • Wood End • Wootton Wawen 	<ul style="list-style-type: none"> • Henley • Kineton • Radford Semele • Studley • Wood End 	<ul style="list-style-type: none"> • Barford • Bearley • Bishops Tachbrook • Claverdon • Cubbington • Hampton Magna • Hatton Park • Hatton Station • Kineton • Kingswood • Long Itchington • Radford Semele • Wilmcote

5.15 SA Objective 13: Economy

- 5.15.1 SA Objective 13 looks at opportunities for new residents to access local employment opportunities by sustainable or active modes of transport or being situated within proximity to existing employment.

- 5.15.2 Collectively, the small settlement locations performed well against SA Objective 13 with all locations situated within the target distance of several employment opportunities. In addition, due to the location of all sites upon undeveloped greenfield land there will be no loss of current employment space. Whilst all small settlement locations have the potential to provide employment opportunities for future residents, the exact mix of future development at each location is unknown at this point in the assessment.

Best and worst performing options

- 5.15.3 When taking into consideration the range of existing employment opportunities within 5km of each location, it is likely that those in close proximity to existing urban areas would perform more favourably. These include Cubbington, Radford Semele, Hampton Magna, Hatton Park, Bishops Tachbrook which are close to Leamington Spa, South Coventry which is close to Coventry and Studley which is close to Redditch.

5.16 Summary of SA findings for Small Settlement Locations

- 5.16.1 The following table summarises the sustainability performance of each Small Settlement Location under each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A**. The assessment of each indicator cannot be 'added' to create an overall score as this would be give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix C** of the Main Report provides detailed assessments of each indicator under each SA Objective.

Table 5.1: Summary findings for the Small Settlement Locations

Small Settlement	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Barford	-	0	-	+	-	-	+	-	++	-	-	-	+
Bearley	-	+	+	+	-	-	+	-	++	-	-	-	+
Bidford	-	0	-	-	-	-	+	-	++	-	-	-	+
Bishop's Tachbrook	-	0	-	+	-	-	+	-	++	-	-	-	+
Claverdon	-	+	-	+	-	-	+	-	++	-	-	-	+
Cubbington	-	0	-	+	-	0	+	-	++	-	-	-	+
Earlswood	-	+	-	+	-	0	+	-	++	-	-	-	+
Hampton Magna	-	+	-	+	-	-	+	-	++	-	++	-	+
Hatton Park	-	0	-	+	-	-	+	-	++	-	-	-	+
Hatton Station	-	0	-	+	-	-	+	-	++	-	-	-	+
Henley	-	0	-	+	-	-	+	-	++	-	-	-	+
Kineton	-	0	-	+	+	-	+	-	++	-	++	+	+
Kingswood	-	0	-	+	-	-	+	-	++	-	++	-	+
Long Itchington	-	0	-	+	-	-	+	-	++	-	-	-	+
Radford Semele	-	0	-	+	-	-	+	-	++	-	-	+	+
Salford Priors	-	0	-	+	-	-	+	-	++	-	-	-	+
South Coventry	-	+	-	+	-	-	+	-	++	-	-	-	+
Studley	-	0	-	+	-	-	+	-	++	-	-	-	+
Wellesbourne	-	0	-	+	-	-	+	-	++	-	-	-	+
Wilmcote	-	0	+	+	-	-	+	-	++	-	-	-	+
Wood End	-	0	+	+	-	-	+	-	++	-	++	-	+
Wootton Wawen	-	0	-	+	-	-	+	-	++	-	++	-	+

6 Evaluation of the New Settlement Locations

6.1 The 7 New Settlement Locations

6.1.1 Reasonable alternative New Settlement locations have been identified as follows:

- A1
- B1
- C1
- E1
- F1
- F2
- F3

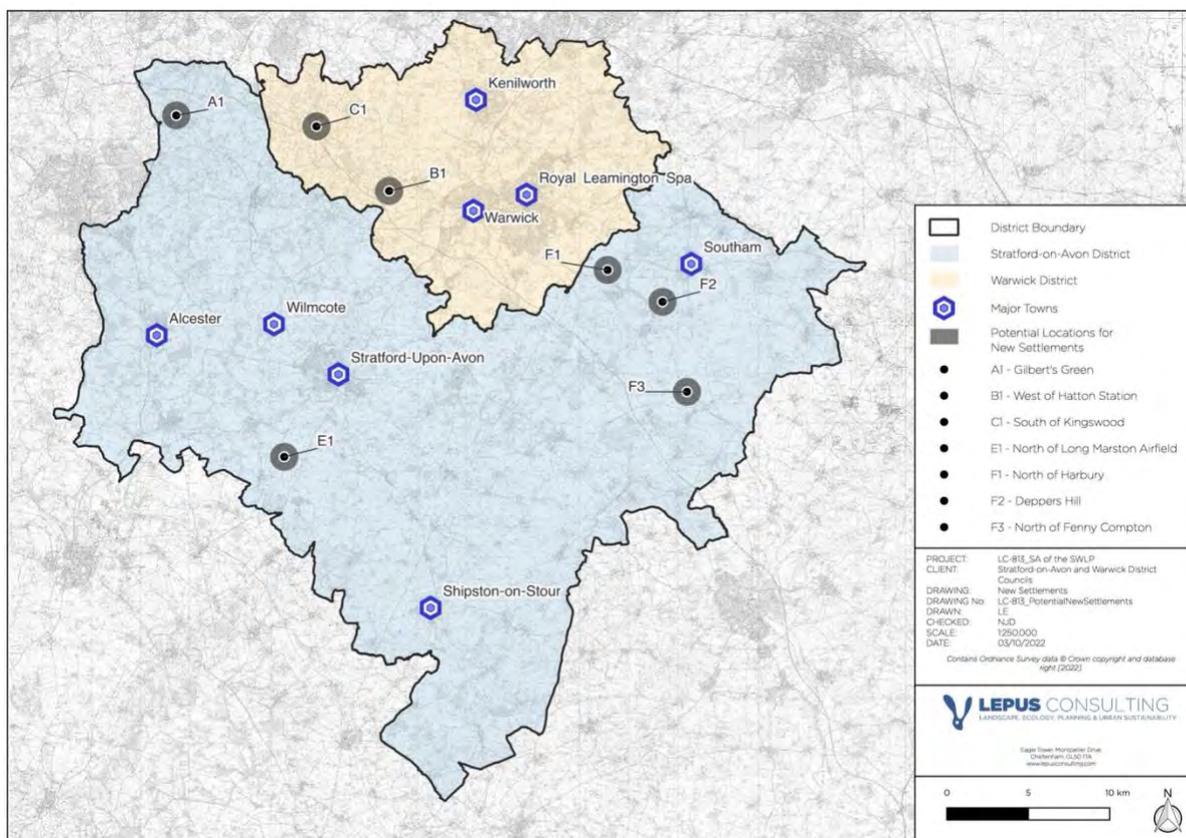


Figure 6.1: Stratford-on-Avon District Council and Warwick District Council administrative boundaries and the New Settlement Locations

6.2 Technical data

6.2.1 **Appendix D** provides an appraisal of 7 New Settlements where, at present, an assumption of 40 dwellings per hectare has been applied and that 40% of the New Settlement would comprise greenspace that optimises green infrastructure benefits including delivery of ecosystem services and protects and enhances natural capital.

6.2.2 The New Settlements have been assessed for likely impacts on each of the 13 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in the tables within each SA Objective, in accordance with the methodology set out in **Chapter 2**.

6.3 SA Objective 1: Climate Change

6.3.1 The proposed large scale residential-led development across the Plan area is likely to result in an increase in GHG emissions. Development could deliver approximately 6,000 or more dwellings. An assumption of 2.38 people per dwelling⁹⁴ across 6,000 additional homes would potentially increase the population of the Plan area by 14,280. With the average emissions in 2020 at approximately 6.65 tCO₂ per capita, GHG levels may subsequently increase by 94,962 tCO₂ following development.

6.3.2 **All New Settlements would be expected to perform in the same manner against SA Objective 1**, with 6,000 new dwellings proposed. It is not possible to select a best performing site against this objective as all New Settlements would lead to an increase in GHG emissions.

6.4 SA Objective 2: Flood Risk

6.4.1 **New Settlements A1, B1, C1 and F1 perform strongest against SA Objective 2**, with less than 1% of the settlement area coinciding with Flood Zones 2 and/or 3 and less than 10% coinciding with areas of high surface water flood risk. New Settlements E1 and F3 perform moderately against Flood Zones 2 and/or 3 but would be likely to induce a minor adverse impact for surface water flood risk. Settlement F2 is the weakest performing site in relation to flood risk as more than 10% of the New Settlement area coincides with Flood Zones 2 and/or 3. Although F2 is less than 10% coincident with areas of high surface water flood risk, areas within Flood Zones 2 and/or 3 are more difficult to mitigate.

6.5 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

6.5.1 None of the New Settlements are expected to present any adverse impacts on Habitat Sites, National Nature Reserves or Local Geological Sites.

6.5.2 Settlements A1 and F1 are expected to present a minor adverse impact on SSSIs, being situated within Impact Risk Zones for Windmill Naps Wood and Ufton Fields respectively. These IRZs state “*any residential development of 50 or more houses outside existing settlements/urban areas*” will require consultation with Natural England.

6.5.3 A1 and B1 are likely to induce a minor negative impact on unnamed Ancient Woodlands. F1 is located approximately 210m Ufton Fields Local Nature Reserve which would also present a minor negative impact on this LNR.

⁹⁴ Office for National Statistics (2022) Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021#number-of-households> [Date accessed: 14/10/22].

6.5.4 All New Settlements present a major negative impact on various Local Wildlife Sites, with the exception of Settlement B1 which is expected to induce a minor negative impact on multiple LWS's including 'Wood at Hatton Farm', 'Grand Union Canal' and 'Railway Embankment'. All New Settlements are also expected to negatively impact priority habitats, primarily deciduous woodland and traditional orchards.

6.5.5 **The New Settlement B1 performs best against SA Objective 3**, being the only Settlement not expected to deliver major adverse impacts to LWS. Though negative impacts may be expected at B1 for an Ancient Woodland and priority habitats, these impacts would be mitigatable by suitably imparting the proposed 40% GI provision within the Settlement layout. Additional biodiversity net gain may also be achieved by following the recommendations of the NPPF.

6.6 SA Objective 4: Landscape

6.6.1 New Settlement E1 is the only location expected to present an adverse impact on the Cotswolds AONB. All New Settlements are likely to induce adverse impacts on landscape character and views from the PRoW networks.

6.6.2 Settlement F2 is expected to majorly adversely impact landscape sensitivity, with a minor negative impact on landscape sensitivity also expected at Settlements A1, E1 and F3. Settlements B1, C1 and F1 are unlikely to impact sensitive landscapes within the Plan area.

6.6.3 A1 and B1 are likely to adversely impact the Arden Special Landscape Area, with F3 expected to adversely impact the Ironstone Hill Special Landscape Area. All other New Settlements are not expected to impact Special Landscape Areas within the Plan area.

6.6.4 Only F3 is within proximity to a Country Park, located approximately 1.5km from Burton Dasset. All other New Settlements are not located near to Country Parks.

6.6.5 New Settlement A1 is likely to increase the risk of coalescence between Aspley Heath, Woodend and Tamworth-in-Arden. A major negative impact would be expected on the risk of coalescence as a result of development at this New Settlement. All other Settlements would be likely to reduce separation between two or more existing settlements, inducing minor adverse impacts with the exception of E1 which poses no risk of coalescence.

6.6.6 **The best performing New Settlements against SA Objective 4 are C1 and F1**, with mitigations required for landscape character, views from PRoW and coalescence and negligible effects expected for all other receptors within this SA Objective.

6.7 SA Objective 5: Cultural Heritage

6.7.1 None of the New Settlements coincide with or affect Grade I Listed Buildings, with only B1 likely to adversely impact a Grade II* Listed Building as it is located approximately 170m from the Church of Holy Trinity and separated by undeveloped land, farmland and greenfield. Settlements A1, B1, C1, F1 and F2 coincide with Grade II Listed Buildings which presents a major adverse impact to those Listed Buildings involved. Settlements E1 and F3 do not impact any Grade II Listed Buildings.

- 6.7.2 Only Settlement C1 is expected to adversely impact a Registered Park and Garden, located approximately 500m from Baddesley Clinton Hall. Settlements A1, F1, F2 and F3 are situated within close proximity to Conservation Areas. Settlement A1 is expected to adversely impact the setting of Tanwor, F1 and F2 are expected to adversely impact the setting of Harbur and F3 is expected to impact the setting of Fenny. Only Settlement C1 is likely to induce a negative impact on the setting of a Scheduled Monument, being located close to Baddesley Clinton Hall moated site and fishponds.
- 6.7.3 **The best performing Settlement is E1**, which is not expected to adversely impact any of the receptors identified within SA Objective 5. Settlement F3 also performs strongly, despite adversely impacting a conservation area. This adverse impact is likely to be mitigatable through the layout and design of the Settlement.
- 6.8 SA Objective 6: Pollution**
- 6.8.1 All New Settlements are located sufficiently far from the six AQMAs and all groundwater source protection zones within the Plan area. Settlements A1, B1, C1 are located within 200m of a main road, which is likely to expose site end users to pollutants associated with vehicular emissions.
- 6.8.2 All Settlements, with exception of E1, are located within 200m of a railway which is expected to present adverse impacts by exposing site end users to transport-associated air and noise pollution. Settlements A1, B1, C1, E1 and F2 are located within 200m of a watercourse which is expected to induce adverse impacts on water quality in the watercourses concerned.
- 6.8.3 **The best performing Settlement is likely to be F1** despite being within close proximity to a railway. Settlement E1 performs similarly to F1 but is close to a watercourse, which is likely to be more difficult to mitigate than proximity to railway as adverse impacts on watercourse quality can be unpredictable and affect water bodies downstream.
- 6.9 SA Objective 7: Natural Resources**
- 6.9.1 Development at all New Settlements is expected to result in a permanent and irreversible loss of BMV soils within the Plan area. All sites are situated on ALC Grade 3 land, with E1 also partially located on ALC Grade 2 land. Coincidence with ALC Grade 3 and above land is expected to present major adverse impacts on these soils.
- 6.9.2 All New Settlements, with the exception of E1 and F3, coincide with Mineral Safeguarding Areas. This results in **Settlements E1 and F3 performing best** against SA Objective 7.
- 6.10 SA Objective 8: Waste**
- 6.10.1 Residential-led development is likely to result in an increase in household waste generation. The potential for the development of over 6,000 dwellings at each New Settlement could potentially increase household waste generation by more than 1% in comparison to current levels within the Plan area, and therefore a major adverse impact on waste would be expected. Consequently, there is **no best performing Settlement** in relation to SA Objective 8 as all Settlements perform in the same manner in terms of waste generation.

6.11 SA Objective 9: Housing

6.11.1 Each New Settlement has the potential for over 6,000 dwellings, resulting in a net gain for the provision of housing within the Plan area and significantly contributing towards meeting housing needs if developed. Subsequently, there is **no best performing Settlement** against SA Objective 9 as all Settlements perform in the same manner in terms of housing provision.

6.12 SA Objective 10: Human Health

6.12.1 Only B1 is situated within the target distance to an NHS hospital with an A&E department, with all other New Settlements expected to adversely impact access to these healthcare services due to their proximity to the nearest NHS hospital.

6.12.2 New Settlements A1, F1 and F3 are likely to positively impact site end users as these Settlements are located within the target distance to GP surgeries. Adverse impacts on site end users' access to GP surgeries are expected at B1, C1, E1 and F2 due to being located outside of the target distance.

6.12.3 All New Settlements are outside of the target distance to leisure facilities, presenting adverse impacts on access to leisure facilities for site end users. None of the New Settlements are located within close proximity to AQMAs, with A1, B1 and C1 located within 200m of a main road. These three Settlements would be expected to present adverse impacts on human health as a result of the exposure of site end users to pollutants associated with vehicular emissions.

6.12.4 Access to PRowS and/or cycle networks is present across all New Settlements, with access to greenspace also present in each New Settlement. The majority of the Settlement area of A1, C1 and F2 have access to greenspace.

6.12.5 **New Settlement A1 performs best against SA Objective 10**, with access to a GP surgery and strong access to greenspace within the Settlement area. F1 and F3 also perform strongly, with both Settlements having access to GP surgeries.

6.13 SA Objective 11: Accessibility

6.13.1 F2 is the only New Settlement within the target distance to a bus stop with regular services. Settlements A1, B1 and C1 are within a sustainable distance to a railway station, with A1 approximately 80m from Wood End Station, B1 coinciding with Hatton Station and C1 approximately 390m from Lapworth Station. Settlements E1, F1, F2 and F3 are outside of the desired distance to a railway station and will consequently present adverse impacts to site end users who require access to railways.

6.13.2 Settlement A1 is the only site with Grade B connectivity, with all other sites situated in areas with Grade C connectivity. Settlements C1, F1 and F3 are the only Settlements located within the target distance to food stores, resulting in minor positive impacts to site end users' access to these local services.

6.13.3 **The best performing Settlement is C1**, with good access to a railway station and food stores, with moderate levels of connectivity. New Settlement A1 also performs strongly, with good connectivity and railway station accessibility.

6.14 SA Objective 12: Education

- 6.14.1 Each New Settlement except for E1 has suitable access to one or more primary schools and subsequently would be expected to present minor positive impacts on site end users' access to educational facilities. All New Settlements are situated outside of the desired distance to secondary education, with A1 and F3 also outside of the target distance to tertiary educational facilities. Settlements located outside of these relevant target distances are expected to adversely impact access to educational facilities.
- 6.14.2 **Settlements B1, C1, F1 and F2 perform equally well against SA Objective 12**, with access to primary and tertiary educational facilities. Settlement E1 performs worst, only within the target distance to tertiary education.

6.15 SA Objective 13: Economy

- 6.15.1 All New Settlements currently comprise undeveloped land and are not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlements could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
- 6.15.2 **Each New Settlement performs the same against SA Objective 13** in relation to employment floorspace provision and access to employment opportunities.

6.16 Summary of findings for the potential New Settlement Locations

- 6.16.1 **Table 6.1** summarises the assessment findings for the New Settlements for each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A**. The assessment of each indicator cannot be 'added' to create an overall score as this would give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix D** provides detailed assessments of each indicator under each SA Objective.

Table 6.1: Summary SA assessments for the New Settlement Locations

New Settlements	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
A1	-	+	-	-	-	-	-	-	++	-	-	-	+
B1	-	+	-	-	-	-	-	-	++	-	-	-	+
C1	-	+	-	-	-	-	-	-	++	-	-	-	+
E1	-	-	-	-	0	-	-	-	++	-	-	-	+
F1	-	+	-	-	-	-	-	-	++	-	-	-	+
F2	-	-	-	-	-	-	-	-	++	-	-	-	+
F3	-	-	-	-	-	-	-	-	++	-	-	-	+

7 Evaluation of the Spatial Growth Options

7.1 Presentation by SA Objective

7.1.1 The following sections discuss how the different Growth Options perform in terms of each SA Objective. The Councils have identified five Spatial Growth Options as follows:

- Rail Corridors
- Sustainable Travel
- Economy
- Sustainable Travel and Economy
- Dispersed

7.1.2 It should be noted that there is considerable overlap between some of the options. For example, Option 2 (Sustainable Travel) is a hybrid of rail corridor options and bus options presented in the 2021 Issues and Options scoping exercise⁹⁵, making it similar in some respects to Option 1 (Rail Corridors).

7.1.3 Option 4 (Sustainable Travel and Economy) is a hybrid of Spatial Growth Options 2 and 3.

7.1.4 Each option includes a list or framework of settlements that might be best placed to deliver the Spatial Growth Option. The settlement locations shown in the options are indicative and should not be taken as firm proposals. In some cases, the individual sustainability performance of some settlements is available in Chapters 4-6 and Appendices B-D of this report. An explicit exercise in evaluating the specific sustainability appraisal of the settlement frameworks has not been undertaken since some settlements have not been evaluated as part of the wider identification of reasonable alternatives at Broad Locations and Small Settlement Locations. Nevertheless, the following evaluation of the five Spatial Growth Options includes an appreciation of the settlement framework as part of the spatial conceptualisation behind the formulation of the Growth Options.

7.1.5 Unlike the Broad Locations, Small Settlement Locations and the New Settlement Locations, the geographic details are less defined; there are no specific boundaries. However, the spatial portraits of each Growth Option are useful in being able to evaluate impacts in terms of size, nature and location. Assessment of the Growth Options can usefully be informed by the application of certain sustainable development principles, some of which are discussed in the evaluation below.

7.1.6 Each Spatial Growth Option is evaluated by SA Objective and each is then ranked since the SA scores have limited granularity (see **Table 2.1** in the methodology). The rank is a high level indication about which option would be likely to perform best when compared to another. Whilst some options may have the same overall SA score, it is possible to specify that one would likely perform better than the other.

7.1.7 A summary of the scores has been presented in **Table 7.1**.

⁹⁵ Scoping and Call for Sites Consultation. Available at: <https://www.southwarwickshire.org.uk/swlp/scoping-and-call-for-sites-consultation.cfm> [Date accessed: 22/11/22]

Table 7.1: Summary SA findings for the Spatial Growth Options

Spatial Option	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Rail Corridors	-	0	+/-	-	+/-	+	+	-	++	+/-	++	+/-	+
Sustainable Travel	-	0	-	+	+/-	+	+	-	++	+/-	+	+/-	+
Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	-	+/-	++
Sustainable Travel & Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	+	+/-	++
Dispersed	--	0	--	+	+	+/-	0	-	++	--	--	-	-

7.2 SA Objective 1: Climate Change

- 7.2.1 The challenges of climate change lie at the heart of the SWLP and all Growth Options have been designed to mitigate against the effects of increased GHG consumption whilst also preparing to continue adapting to the legacy of climate change effects which will affect daily life during the plan period and beyond. Effects such as increased storm and flood frequency, hot summers with associated drought, biodiversity, food production and health implications will affect the quality of life for everybody living in the Plan area. The planning process can play its part in providing solutions that reduce consumption and prepare for the future.
- 7.2.2 All options direct development to the open countryside, so it is likely that the majority of development would be located on previously undeveloped land. It would also be expected to result in an increase in carbon emissions due to the construction and occupation of development, including through an increase in the number of vehicles on the road which is a major source of greenhouse gases (GHGs). Development proposals would be likely to result in a net loss of vegetation cover and permeable soils, which help to attenuate flood risk, and therefore, would be expected to result in the exacerbation of flood risk across many of these locations. This could potentially result in detrimental impacts in regard to human health and safety. Loss of soil reduces the ability to sequester carbon in organic matter such as grass and soil.
- 7.2.3 Understanding and quantifying climate change effects requires good appreciation of a wide range of variables. The Council has commissioned a climate change study to better understand some of the likely impacts and effects on climate change associated with the Growth Options (and New Settlements). Once available, data can be used to evaluate the Growth Options.
- 7.2.4 Whilst it is challenging to evaluate the five options and there will be a mix of positive and negative effects in all options, the balance of effects associated with Option 5 (Dispersal) will be characterised by more adverse effects since motorised private transportation is one of the main contributors to GHG emissions alongside agriculture and energy consumption.

7.2.5 On balance, development at this scale will have more negative effects than positive ones on SA Objective 1. There is no outstanding best performing option; spatial options 1 to 4 have been assessed as being likely to perform in a similar way at this stage. Without further detail it is not possible to identify a standout best performing option in relation to this objective. Assuming Option 3 will deliver employment opportunities near to new homes, this option would have more potential to reduce GHG emissions related to travel to work.

7.3 SA Objective 2: Flood Risk

7.3.1 Watercourses that pass through the two districts include the River Avon, Arrow, Alne, Dene and Stour. Fluvial flood risk is primarily located around the larger rivers like the Stour and the Avon.

7.3.2 No single Option is expected to perform better or worse than the other for flood risk. The principles of flood risk avoidance and management will apply to all development wherever it is needed in the plan area. There should be no allocations that are coincident with Flood Zone 2 or 3 unless they can be incorporated into sound green and blue infrastructure design.

7.3.3 Due to the rural nature of the districts, and low levels of brownfield land, all options direct significant quantities of development to previously undeveloped land in the countryside, leading to a loss in vegetation coverage and permeable soils. Surface water flooding can be mitigated through Sustainable Urban Drainage Systems (SUDS).

7.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

7.4.1 Warwickshire's Ecological Network is a special quality that is associated with the Plan area and the County as a whole, a place that is famous for its ancient woodland and distinctive countryside. Large swathes of the plan area are Green Belt which helps protect loss of soil and maintain habitats. The quality of habitats varies across the plan area and the Wildlife Trust's Nature Recovery Network is an important step in the right direction to help protect and enhance biodiversity at a strategic scale. Green Belt does not necessarily equate with high quality habitats and careful evaluation of the Green Belt in terms of intrinsic biodiversity quality is essential to better understand any impacts of locating development there.

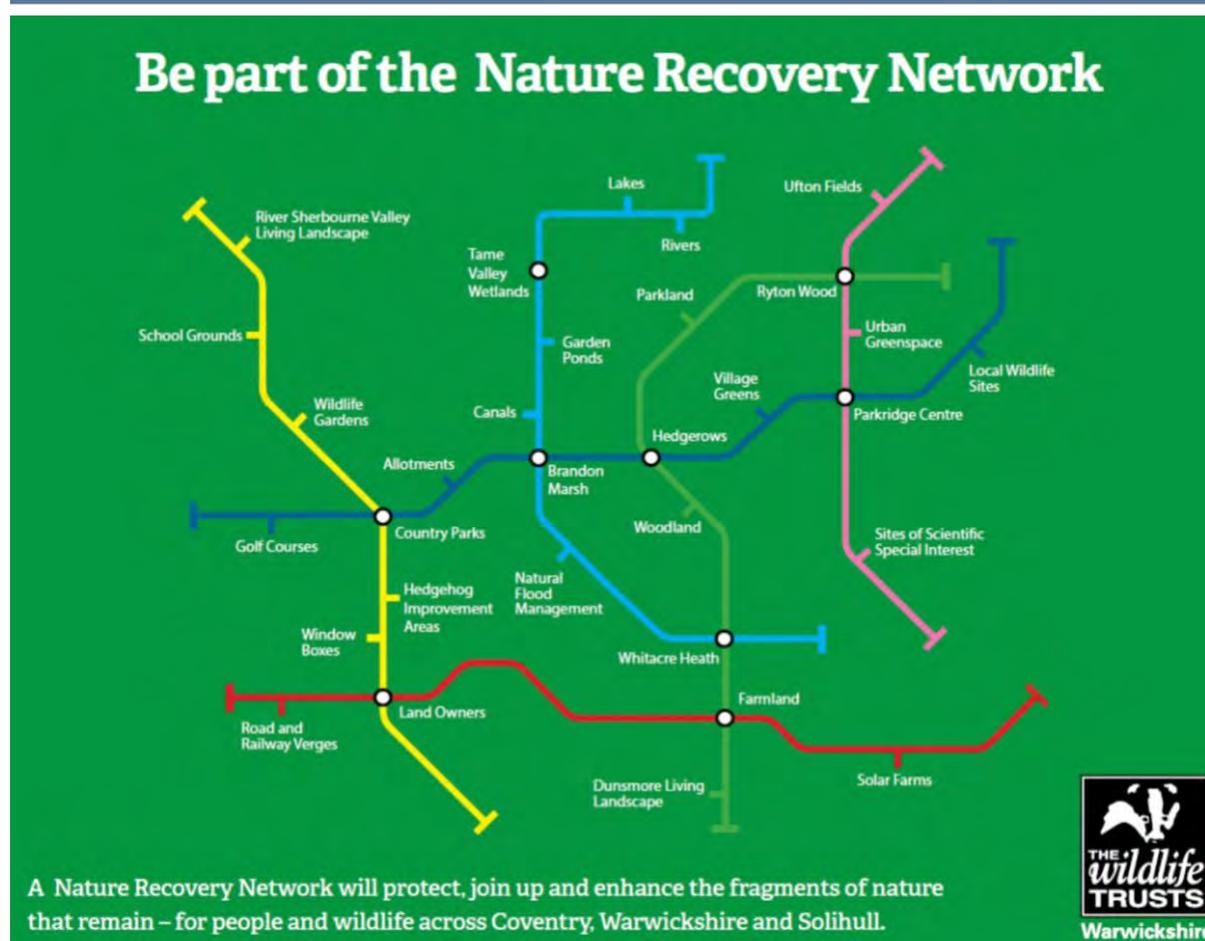


Figure 7.1: Schematic map of Warwickshire's Nature Recovery Network

7.4.2 Direct impacts on biodiversity associated with development include:

- Loss of habitat type
- Habitat fragmentation
- Impact on designated species
- Local extinction
- Loss of species richness
- Reduction in genetic diversity
- Isolation

7.4.3 Some examples of indirect effects include:

- Impact on ecosystem services
- Impact of water quality
- Impact on air quality
- Impact of ecosystem function
- Reduced enjoyment for people.

7.4.4 As with climate change impacts, any attempt to spread development and introduce increased car use will affect biodiversity. Direct loss of habitats should be avoided and the findings from the settlement evaluation in **Appendices B-D** reveal that the most common features likely to be affected are Local Wildlife Sites and Priority Habitats. Without exact details of development footprint, it is challenging to make an evaluation beyond one that looks at principles. In this respect, dispersal is likely to be the worst performing Spatial Option. It will increase disturbance on a wider scale. Habitat loss can be avoided with detailed land use planning and adherence to the Nature Recovery Network is critical in the choice of a preferred Growth Option. Option 1 (Rail Corridors) appears to present the option with highest density of development being focused on railway stations as nodes for development; perhaps this might reduce wider impacts on biodiversity. However, restoration of disused railway lines that have since become valuable wildlife locations will need careful planning to offset and protect biodiversity which will be displaced in the short term.

7.5 SA Objective 4: Landscape

7.5.1 Landscape designations include parts of the Cotswolds AONB, the four Special Landscape Areas identified in the Stratford Core Strategy which include Arden, Cotswold Fringe, Feldon Parkland and Ironstone Hill Fringe. There are a number of Areas of Constraint which also serve as landscape protection and management designations in Stratford-on-Avon district.

7.5.2 The distinctive quality of the landscape in South Warwickshire includes rolling hills and woodland; it includes the nationally important Cotswolds AONB designation. Residents feel passionately about their countryside and it was an important theme of the earlier consultation on the SWLP in 2021. Particular parts of the landscape are sensitive to change, those which have distinctive features and strong integrated character. This is evident in the landscape evaluation work that was prepared to inform the Stratford Core Strategy⁹⁶. It would be useful to undertake landscape evaluation to better inform the SA process, perhaps at the preferred options stage.

7.5.3 All spatial options are likely to be located, in large part, on previously undeveloped land, which introduces a likely risk of urban sprawl into the surrounding countryside. The proposed development in all Growth Options could potentially be discordant with the local landscape character. Some options, eg Option 1 (Rail Corridors) are focused in a smaller number of locations however, the landscape receptors at each location will determine the extent to which a landscape can accommodate change without permanent adverse effects. Some railway station locations are in attractive countryside with small villages; new development at the scales proposed in the growth options could transform these areas into built up locations. In locations that are already built up and which can cope with urban extensions may be less sensitive to effects on the landscape. Option 2 (Sustainable Travel) possibly fits most closely with this scenario.

7.5.4 Overall, a significant adverse effect on the local landscape cannot be ruled out when discussing growth at the scale envisaged by the plan. It would be expected that all options will alter the view experienced by users of the local PRow network and local residents to some extent. Option 5 (Dispersal) is potentially the best option leading to the least adverse effects sine overall scale of development is more thinly spread and distributed.

⁹⁶ White Consultants (2011 and 2012) Landscape sensitivity evaluation of main settlements and local service villages.

7.6 SA Objective 5: Cultural Heritage

- 7.6.1 Warwickshire has a very distinctive cultural heritage as documented in the Warwickshire Historic Landscape Characterisation (2010 by Ben Wallace). The Growth Options all have the ability to adversely impact heritage and likewise, depending on design quality, have the opportunity to ensure historic assets become part of building beautiful places.
- 7.6.2 Loss of the countryside to new development will inevitably affect heritage such as ridge and furrow or the setting of locations like Registered Parks and Gardens or Listed Buildings. Scale and impact of growth may restrict the ability to avoid adverse effects at particular locations for example expansion of Warwick and Kenilworth may both introduce irreversible effects on the Grade 1 Listed Castles however smaller settlements might be able to avoid the physical impacts of massing and urban sprawl which is inevitable associated with concentrating development in a large location such as the polycentric strategic positioning of Warwick, Leamington Spa and Kenilworth. In this respect Option 5 (Dispersal) may perform better than options that concentrate development, especially allocating employment and housing next to each other.
- 7.6.3 Heritage assets are located principally, but not exclusively, within the towns and village. Many heritage assets can be found in areas with high accessibility, including town centres. They often make an important contribution to the sense of place and can play an important role when considering sustainable Spatial Growth Option development proposals. All of the main settlements have strong historic associations such as Roman Alcester and towns of Warwick and Stratford-upon-Avon that both have strong Medieval and Georgian architecture influences.
- 7.6.4 The design and layout of development proposals are a critical consideration for the historic environment. Options 1-4 are likely to seek to intensify under-utilised and vacant space within town centres. Utilising vacant space would introduce new built form. Any proposals for development at these locations will need to carefully consider how new development will best fit with the existing built form or if development is inappropriate due to irreversible impacts on cultural heritage. In considering design aspirations, the principles of the 2020 'Building Better, Building Beautiful' report⁹⁷ should be embraced. There are three pillars to the approach advocated in this report: "*ask for beauty, refuse ugliness and promote stewardship*". It is not possible to determine specific impacts on cultural heritage at each location until these are properly understood and potential allocations have been identified. If the 'Building Better, Building Beautiful' principles can be followed, impacts on cultural can be avoided and or mitigated. Similarly, there could be opportunities to facilitate positive effects, especially if cultural heritage features are carefully factored into the public realm to emulate a sense of civic pride and raise awareness of the feature in question.

⁹⁷ MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf [Date accessed: 20/10/22]

7.7 SA Objective 6: Environmental Pollution

- 7.7.1 Environmental Pollution probably manifests itself cumulatively rather than at the project scale and in this respect all Growth Options will have a bearing on diffuse pollution associated with development. Impacts to water courses should be avoided from construction using environmental management plans. However, pollution impacts to rivers will come from sewage overflows which are associated with a combination of new development and storm events exacerbated by climate change that can exert challenging pressure on existing infrastructure.
- 7.7.2 Air quality is likely to improve from any option that promotes sustainable transport such as Options 1 and 2. Reducing the need to travel by locating employment close to residential areas may also help in this respect.

7.8 SA Objective 7: Natural Resources

- 7.8.1 All growth options will lead to loss of BMV land. Development proposed in these locations would be expected to result in the loss of this agriculturally important soil resource.
- 7.8.2 Under All Options, development would be directed towards the open countryside. The scale and extent of each option varies with Option 5 possibly having the greatest versatility in terms of being able to avoid areas of BMV since the distribution spreads development to a wide range of locations. This is no guarantee that BMV will be protected through the Growth Options selection as detail is necessary to better understand the precise implications of development on BMV land.
- 7.8.3 Development proposals directed to previously undeveloped locations would be expected to result in a permanent and irreversible net loss of ecologically and agriculturally valuable soils caused by excavation, compaction, erosion, contamination, and removal of vegetation cover.
- 7.8.4 Options 1 and 2 potentially promote high density development. A key benefit of higher development densities is that less land would be required to be built on to satisfy the local development needs. This would help to limit the permanent and irreversible losses of agriculturally and ecologically valuable soils caused by development delivered through the SWLP. Therefore, these two options would be likely to have a minor positive impact on natural resources.

7.9 SA Objective 8: Waste

- 7.9.1 All options will result in waste generation. At the time of writing, there is not sufficient information available to accurately predict the effect that each spatial option would have in terms of minimising waste generation, promoting the sustainable management of waste, or encouraging recycling and re-use of waste. It is likely that all options would increase waste generation and place pressure on existing waste management systems, to some extent. However, evidence suggests that developmental growth within the Plan area would not significantly increase waste generation, as the quantity of waste produced by each household and business is generally reducing. All Options perform similarly as they purport to deliver the same quantity of housing. The dispersal option will have more adverse effects on climate change as more mileage will be covered by waste management vehicles.

7.10 SA Objective 9: Housing

7.10.1 All options will increase the volume of housing. The new HEDNA is due for release soon and this will be used in the SA process to inform evaluation of this SA objective. Ensuring a variety of homes are built, including affordable homes, is essential to help combat homelessness.

7.11 SA Objective 10: Health

7.11.1 As a primarily rural plan area, access to the countryside will provide site end users with good opportunities to pursue a healthy lifestyle. Both of these factors would be expected to have physical and mental health benefits for local residents. Whilst access to a GP surgery is a possibility for some of the settlements access to A&E departments is not. In this respect Options that can facilitate new infrastructure as part of geographic concentration and delivery through a critical mass will perform better. Under all Growth Options, development would be directed to countryside locations which are generally located towards the urban edge. New residents situated in these areas would be likely to have more limited access to health care facilities and development would result in the loss of some previously undeveloped land and associated natural habitats.

7.11.2 Impacts on health from roads and railways need to be carefully considered. For example, the AQMAs are principally in larger urban areas which reflects the poor levels of air quality in these locations.

7.11.3 Development at lower densities can have benefits to human health, by providing footpaths and cycleways for active travel, space for residential gardens, open spaces for outdoor exercise and adequate indoor residential space. Only Option 1 infers slightly higher density development associated with expansion at railway stations in the Options and this is caveated in the Option 1 supporting text.

7.11.4 Option 5 (Dispersal) is the worst performing Growth Option. Options 1, 2, 3 and 4 are all associated with development in Warwick and or within reach Alexandra Hospital at Redditch where development will be supported by access to A&E services within the sustainable distance of 5km. However there are large parts of the area that lie outside of the sustainable distance for access to A&E.

7.12 SA Objective 11: Accessibility

7.12.1 Most of the existing railway stations in South Warwickshire lie within or close to the West Midlands Green Belt, and consequently this growth option would require the release of a significant amount of Green Belt land. South Warwickshire's railway stations are not evenly spread over the area, and many are in very small settlements. In many parts of South Warwickshire, bus travel is the only viable public transport option.

7.12.2 Option B (Sustainable Travel) would promote development along main roads with bus routes. Building on main bus corridors is, of course, based on the road network. This could be seen as a less sustainable option if new residents and employees do not choose to use the bus service. However, by positioning new development on main bus corridors, people are provided with the choice. This approach should also consider any future proofing for electric cars and or consider the option (see policy options for 20 minute neighbourhoods in **Appendix E**) which embraces 20 minute neighbourhood principles rather than just road with bus routes.

7.12.3 It should be noted that at this stage in the plan-making process, no detailed feasibility work has been undertaken around the capacity of existing rail infrastructure or the potential for enhanced or new services. There may be locations identified in these growth options where rail improvements are found not to be feasible, or where the existing capacity could support only limited growth. Further work will be undertaken as the growth options are further refined.

7.12.4 The Options do not mention opportunities to “*promote healthy lifestyles*” which could potentially include encouraging active travel such as walking and cycling. Green infrastructure provision is an important consideration in this respect. It is noted however that the policy options (see **Appendix E**) address these matters in more detail.

7.12.5 Options 1, 2 and 4 will deliver the best results overall for accessibility. Option 5 is the worst performing due to inevitable reliance on car-based transport and lack of sustainable transport modes. Option 3 to some extent may also see greater reliance on car transport modes associated with economic development that maybe needs more flexibility than that offered by buses and/or exploits locations that are close to motorways.

7.13 SA Objective 12: Education

7.13.1 The extent to which all spatial options would facilitate good education for new residents is almost entirely dependent on the specific location of development, which is uncertain at this stage. Option 5 is likely to be the worst performing since students may have to travel further afield if widely distributed across the Plan area.

7.14 SA Objective 13: Economy

7.14.1 There are a range of different employment sectors in the Plan area, with professional services, health services, transport services, retail and wholesale trades, motor industry as well as the self-employed.

7.14.2 Options 3 and 4 will deliver the best results overall for economy since they explicitly focus on the supply of employment land either alongside existing and new development proposals or on the rail lines. Option 5 is the worst performing due to its widespread nature. This misses the opportunities and economies of scale that enhance and expand local economic multipliers that are more likely to occur with critical mass in locations that have a range of infrastructure as well as supporting workforce who can easily access their place of work. Working from home approaches which became necessary during the Covid Pandemic are already reverting to work patterns that include attending the workplace more regularly once more.

7.15 Conclusion

7.15.1 High level assessment of Spatial Growth Options that are not all distinct from each other, with the exception of Option 5, means that sustainability performance can only be evaluated with several caveats. These include the fact that detailed locational information is not available and the ability to identify effects with precision is challenging. The scores in **Table 7.1** are strictly a guide and do not represent a diagnostic analysis. Mitigation has not been factored into the performance of the Growth Options since it is best worked up once more detailed locational information is available.

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- 7.15.2 Different options are likely to perform better for certain SA Objectives than others. With this in mind, an overall best performing option is hard to identify. Option 5 is the worst performing option whilst Option 2 is likely to align most closely with development that will ultimately seek the most effective mitigation against climate change. These options will also deliver better performance in respect of pollution and natural resource impacts since they are both slightly more concentrated than Options 3 and 4. However, whilst they perform positively for employment and economy, Options 3 and 4 are best in this respect. Without further detail, all options perform the same for waste and housing.

8 Evaluation of the Policy Options

8.1 Assessing the policy options

- 8.1.1 The South Warwickshire Councils have identified a range of policy options for consideration, as part of the Issues and Options Consultation for the emerging Local Plan. The policy options include those for delivering the area's economic and housing needs as well as covering various development management aspects.
- 8.1.2 Policy options have been identified by the Councils for 63 of the 'Issues' identified within the Issues and Options document. This appendix provides an assessment of 116 policy options, associated with these 63 options.
- 8.1.3 Each option appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**) and is in accordance with the methodology as set out in the SA Main Report.
- 8.1.4 The assessments are presented in **Appendix E** and are based on the policy options as presented in the South Warwickshire Local Plan Issues and Options Consultation document, dated November 2022.
- 8.1.5 The assessments have identified the best performing option for each policy where possible, or in some circumstances recommended that a combination of options could potentially result in the most sustainability benefits.

8.2 Summary of findings

- 8.2.1 There are a wide range of policy options that offer different approaches to place making and delivering development needs for South Warwickshire. In general, those policies which include strong positive interventionist approaches tend to have the highest levels of sustainability performance.

9 Housing and Employment number option assessments

9.1 Housing number options

Option I	The HEDNA trend-based projections point to a need for 4,906 dwellings annually across the whole sub-region with 868 dwellings per annum in Stratford-on-Avon and 811 dwellings per annum needed in Warwick. Combined total of 1,679 per annum.
Option II	The Standard Method calculation identifies a need for 5,554 dwellings annually across Coventry and Warwickshire, but with 564 dwellings per annum in Stratford-on-Avon and 675 dwellings per annum needed in Warwick. Combined total of 1,239 per annum.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Options	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
Option I	--	+/-	-	--	+/-	-	--	-	++	+/-	-	+/-	+
Option II	--	+/-	-	--	+/-	-	--	-	++	+/-	-	+/-	+
Best performing	II	II	II	II	II	II	II	II	I	?	?	?	?

9.1.1 Addressing the diverse accommodation needs for all residents in South Warwickshire, the housing number options in the SWLP have been identified through the Housing and Economic Development Needs Assessment (HEDNA), based on new-trend projections for population and the Standard Method for the calculation of housing need. The methods of calculating housing need are described in more detail under Issue H1 of the Issues and Options document.

9.1.2 While the HEDNA calculation of housing need identifies a lower overall figure for the sub-region, the annual housing need figures for the Stratford-on-Avon and Warwick Districts are higher than using the Standard Method.

9.1.3 Pursuing either of the options would result in major positive impact on SA Objective 9 as it is expected that the proposed housing numbers would largely cater to the housing needs of all the residents, including affordable, student, old persons, specialist and self and custom build housing, along with the accommodation needs of gypsy and traveller and travelling showpeople communities. Using the HEDNA figure should more accurately represent local housing needs than the Standard Method and therefore Option I should meet the accommodation needs of the various members of the community more successfully.

9.1.4 Both the housing number options could have negative impacts on SA Objectives 1, 3, 6 and 7. Substantial new housing development would be likely to give rise to major negative impacts on climate change and potentially have adverse impacts on biodiversity and pollution emissions. It is likely that a significant loss of Best and Most Versatile agricultural soils could not be avoided and a significant adverse impact on natural resources would be anticipated. The increase in waste generated from construction and occupation of housing would be likely to lead to a negative impact on SA Objective 8.

- 9.1.5 Given the high value and sensitivity of the landscape across the plan area, delivering large scale housing development across the SWLP region will potentially have an adverse impact on the landscape and townscape character of the local plan area. The impact of Option I on SA Objective 4 and 5 will be potentially higher than Option II due to higher housing numbers.
- 9.1.6 It is assumed that the availability of new housing would translate into reduced travel times and proximity to workplace/ employment sites for people living, visiting or working in the plan area. As a result, a minor positive impact on SA Objective 13 could be expected.
- 9.1.7 The consideration of housing number calculations does not provide any locational information as to where development would come forward and therefore impacts on SA Objectives 1, 5, 10 and 12, Flood Risk, Cultural Heritage, Health and Education are uncertain.
- 9.1.8 In terms of identifying a best performing option, Option II performs better overall (see SA Objectives 1-8). In the case of some objectives, it is difficult to identify a best performing option (see SA Objectives 10, 11, 12 and 13).

9.2 Employment number

	Office	General Industrial	Total
Stratford-on-Avon District	7.2	240.9	248.1
Warwick District	15.8	81.4	97.2

1	2	3	4	5	6	7	8	9	10	11	12	13
Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
--	0	-	--	+/-	--	--	-	0	-	-	+	++

- 9.2.1 The HEDNA has considered employment and land requirements across Coventry and Warwickshire to 2050. For office and general industrial land, a requirement of 345.3 hectares has been proposed to meet needs until 2050. For strategic B8 employment land (i.e. warehousing and distribution), a requirement of 709 hectares has been identified for the wider sub-region.
- 9.2.2 In the case of the plan area, the requirements for office space and general industrial have been apportioned to Warwick and Stratford-on-Avon as per the above table.
- 9.2.3 It is expected that the new employment land allocations and developments will generate more jobs and employment opportunities, create new investment opportunities and encourage creation of small and micro-businesses, therefore a major positive impact on SA Objective 13 is expected.
- 9.2.4 It is assumed that the new employment opportunities would be beneficial for people living, visiting or working in the plan area in terms of job creation and the opportunity to develop skills, therefore a minor positive impact on SA Objective 12 is anticipated.

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- 9.2.5 Development associated with new employment could have a major negative impact on SA Objectives 1 and 6 and minor negative impacts on SA Objective 3 as the increase in economic and industrial activities would give rise to adverse impacts on climate change and pollution emissions and could potentially be detrimental for the plan area's biodiversity and geodiversity.
- 9.2.6 Given the high value and sensitivity of the landscape across the plan area, delivering the employment number and the spread of development across the SWLP region will potentially have an adverse impact on the sub-region's landscape and townscape character and a major negative impact on SA Objective 4 could occur in the SWLP.
- 9.2.7 With new economic development, there may be increased pressure on existing transport infrastructure to meet the transport needs of people living, visiting or working in the plan area and therefore it is assumed that SA Objectives 10 and 11 may be negatively impacted. The increase in waste generated from construction and occupation would translate into minor negative impact on SA Objective 8.
- 9.2.8 With respect to the natural resources in the region, especially water and soil, the large-scale economic and industrial development would affect the quality of these resources and thus a major negative impact on SA Objective 7 could also be anticipated.

10 Conclusions and next steps

10.1 Selection and rejection

10.1.1 All reasonable alternatives have been evaluated using a wide range of receptors, sources and indicators. The likely impacts from development at different scales have been estimated and the results provide some idea, initially, about how different reasonable alternatives will perform in terms of sustainable development.

10.1.2 There are limitations to the assessment process and assumptions have been stated in the methodology section (see **Chapter 2**). Notwithstanding these, it is now possible to consider some of the results and what should be considered as the plan making moves into a key stage of public consultation.

10.1.3 The Councils will now assimilate the information and incorporate this into the next round of consultation before making decisions on selection and rejection. It is a requirement to identify the best performing reasonable alternatives, which has been done in the preceding chapters. Public consultation will help clarify the status of these best performing options which have been identified using and extensive analysis of secondary data.

10.2 Further research

10.2.1 The following additional research is recommended to better inform the SA of the plan:

- Biodiversity assessments of the Broad Locations
- Landscape Assessment to explore character, sensitivity and capacity at the BLs.
- Air Quality impact assessment at the plan level.
- Cultural Heritage evaluation at the Broad Location scale.

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Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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Sustainability Appraisal of the South Warwickshire Local Plan

Regulation 18: Issues and Options Stage

Volume 3 of 3: Appendices

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Front cover: St Nicholas Church at Alcester, Stratford-on-Avon, Warwickshire

Appendices

- Appendix A SA Framework
- Appendix B Technical Appendix: Broad Locations
- Appendix C Technical Appendix: Small Settlements
- Appendix D New Settlement Options
- Appendix E Policy Options

Appendix A: SA Framework

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
1	Climate change: Reduce the authorities' contribution towards the causes of climate change and adapt to the anticipated effects of climate change.	a. Help to reduce the per capita carbon footprint in the plan area? b. Help to reduce reliance on personal car use? c. Encourage renewable energy generation or use of energy from renewable sources? d. Ensure that sustainable construction principles are integrated into developments, including energy efficient building design? e. Encourage climate change resilience? f. Include measures to adapt to anticipated effects of climate change?	<ul style="list-style-type: none"> • GHG emissions from domestic and industrial/commercial sources • Energy generation/use from renewable or low-carbon sources • Proximity of development to public transport links • Encourage active travel to local services and amenities • Incorporation of GI measures to reduce overheating in summer, such as publicly accessible green space and tree planting to support urban cooling • Implementation of adaptive techniques in building design e.g. passive heating/cooling
2	Flood risk: Reduce and plan for flood risk including anticipated levels as a result of climate change.	a. Avoid development in areas at high risk of flooding and seek to reduce flood risk? b. Increase green infrastructure (GI) coverage and connectivity? c. Promote the use of technologies to adapt to the impacts of climate change? d. Ensure that development is resilient to the effects of extreme weather events? e. Include measures to reduce the risk of flooding?	<ul style="list-style-type: none"> • Development located in areas at greater risk of fluvial and surface water flooding and mitigation measures required to mitigate flood risk • Provision of sustainable drainage systems (SuDS) • Provision and connectivity of Green and Blue Infrastructure • Use of climate change allowances regarding flood risk, appropriate to the development type
3	Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	a. Protect, maintain or enhance features of biological and geological importance? b. Support the positive management of local biodiversity and geodiversity sites? c. Contribute towards the wider GI and ecological network? d. Deliver biodiversity net gain?	<ul style="list-style-type: none"> • Potential impacts on sites designated for their biological or geological interest • Protection and enhancement of priority habitats • Measures to protect and/or enhance opportunities for priority species

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
		e. Create opportunities for biodiversity to adapt to a changing climate?	<ul style="list-style-type: none"> • Provision, connectivity and management of GI to enhance the habitat network • Biological quality of watercourses
4	Landscape: Protect, enhance and manage the quality and character of landscapes and townscapes.	a. Safeguard and enhance local character and distinctiveness and strengthen sense of place? b. Protect and enhance visual amenity? c. Restore and enhance degraded landscapes or townscapes? d. Protect and enhance the special character of nationally designated landscapes? e. Affect the purposes of the Green Belt, such as, prevent coalescence of settlements and urban sprawl?	<ul style="list-style-type: none"> • Effects on the special qualities of nationally designated landscapes, such as the Cotswolds National Landscape • Identified local landscape characteristics and sensitivities within the published Landscape Character Assessment or any published landscape sensitivity assessment • Impact on views and tranquillity • Re-use of brownfield land and/or derelict buildings • Development in the Green Belt • The quality of streetscapes and the public realm
5	Cultural heritage: Protect and enhance the historic environment in an appropriate manner to the significance of the asset.	a. Conserve and/or enhance the significance of heritage assets including their settings where this contributes to significance? b. Respect, maintain and strengthen local character, distinctiveness and sense of place? c. Sustain and enhance the significance of heritage assets by putting them to viable use, increase public access and/or encourage tourism which are consistent with their conservation?	<ul style="list-style-type: none"> • Potential impacts on heritage assets including Listed Buildings, Scheduled Monuments, Conservation Areas and Registered Parks and Gardens and their settings • Potential impacts on identified locally important heritage assets • Historic assets on Historic England's Heritage at Risk register • Historic characterisation and sensitivity studies
6	Pollution: Reduce pollution and mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.	a. Help to improve air quality and avoid generating further air pollution? b. Avoid locating residents or employees in areas of poor air quality? c. Help to improve water quality and avoid generating further pollution to watercourses or groundwater? d. Remediate land affected by ground contamination? e. Help to reduce noise pollution and avoid generating further noise disturbance?	<ul style="list-style-type: none"> • Receptors located within, or in proximity to, Air Quality Management Areas (AQMA) • Areas of NO₂ or PM₂₅ exceedance • Proximity to main roads • Watercourse and groundwater quality • Remediation of contaminated land

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
		f. Reduce pollution?	
7	Natural resources: Protect and conserve natural resources including soil, water and minerals.	a. Make use of previously developed, degraded or under-used land? b. Minimise the loss of best and most versatile (BMV) agricultural land? c. Avoid loss or sterilisation of mineral resources? d. Ensure efficient use of water resources and seek opportunities for water recycling?	<ul style="list-style-type: none"> • Re-use of previously developed or brownfield land • Area of potential BMV land • Proposed Mineral Safeguarding Areas • Remediation of contaminated land
8	Waste: Reduce waste generation and disposal and support sustainable management of waste.	a. Maximise the re-use, recycling and composting of waste? b. Minimise and where possible avoid the generation of excess waste during construction and occupation of development?	<ul style="list-style-type: none"> • Household waste generation • Industrial/commercial waste generation • Rates of recycling and composting • Capacity of waste management facilities
9	Housing: Provide affordable, high quality and environmentally sound housing for all.	a. Provide a suitable mix and tenure of housing including affordable homes and homes suitable for first-time buyers? b. Provide housing suitable to accommodate the ageing population? c. Meet the needs of the Gypsy, Traveller and Travelling Showpeople communities? d. Ensure that the best use is made of existing housing stock?	<ul style="list-style-type: none"> • Housing stock • Provision of varied housing mix • Provision of affordable housing • Provision of care homes or sheltered accommodation • Gypsies and Travellers accommodation • Meeting the need for custom and self build.
10	Health: Safeguard and improve community health, safety and wellbeing.	a. Improve access to local health and leisure facilities? b. Provide good access to open spaces and the GI network? c. Facilitate active travel and encourage healthy lifestyles? d. Ensure the needs of the ageing population are met? e. Create safe neighbourhoods and support community cohesion? f. Reduce crime and the fear of crime?	<ul style="list-style-type: none"> • Proximity to sources of air pollution (e.g. AQMAs and main roads) • Proximity to NHS hospital • Proximity to GP surgery • Provision and accessibility of public green spaces and recreation facilities • Connectivity to pedestrian and cycle networks • Indices of Multiple Deprivation/Lower Super Output Areas

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
			<ul style="list-style-type: none"> • Health indicators • Rates of crime
11	Accessibility: Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.	a. Reduce the need to travel and/or reduce travel time? b. Support a modal shift away from personal car use? c. Maximise opportunities for access via a range of sustainable transport modes including walking, cycling and public transport?	<ul style="list-style-type: none"> • Proximity to bus stop and frequency of bus services • Proximity and accessibility to railway stations • Proximity to local shops, facilities and employment opportunities • Connectivity to pedestrian and cycle networks
12	Education: Increase access to education and improve attainment to develop and maintain a skilled workforce.	a. Provide or improve sustainable access to education and training opportunities? b. Support the provision of an appropriately skilled workforce? c. Support opportunities for community enterprises and the voluntary sector?	<ul style="list-style-type: none"> • Proximity to primary and secondary schools • Capacity of primary and secondary schools • Access to higher education opportunities • Qualification levels e.g. National Vocational Qualifications
13	Economy: Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.	a. Provide or improve sustainable access to a range of employment opportunities? b. Protect and create jobs? c. Encourage business start-ups in the plan area? d. Protect and enhance the vitality and viability of existing employment areas? e. Protect and enhance the vitality and viability of town centres?	<ul style="list-style-type: none"> • Access to employment opportunities • Provision of employment floorspace • Support for town centres and town centre regeneration • Number of vacant units • Rates of unemployment

Appendix B: Assessment of Reasonable Alternative Broad Locations

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B.1 Introduction

B.1.1 Overview

- B.1.1.1 This appendix provides an appraisal of 32 Broad Locations where, at present, an assumption of 35 dwellings per hectare has been applied and that 40% of the location would comprise greenspace that optimises green infrastructure benefits including delivery of ecosystem services and protects and enhances natural capital.
- B.1.1.2 The Broad Locations have been assessed for likely impacts on each of the 13 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in the following tables, in accordance with the methodology set out in **Chapter 2** of the main SA Report.
- B.1.1.3 At this stage, all assessment is based on desktop review of available data and information about receptors and sources.
- B.1.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by Stratford-on-Avon and Warwick District Councils, as well as expert judgement.
- B.1.1.5 A number of recommendations have been made for further surveys to improve granularity of assessment. These can be found in the main report.

B.2 Alcester Northeast

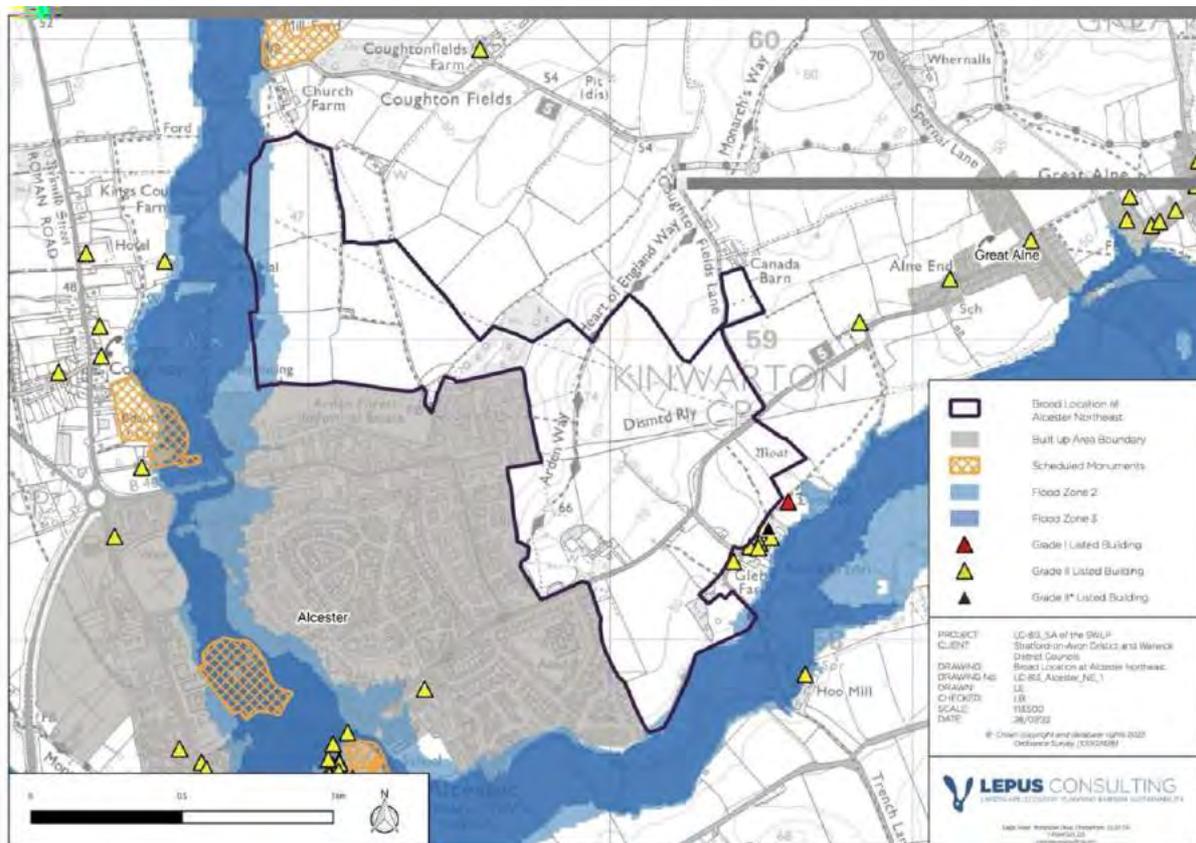


Figure B.2.1: Broad Location at 'Alcester Northeast' with selected constraints

B.2.1 SA Objective 1: Climate Change

Table B.2.1: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.2.2 SA Objective 2: Flood Risk

Table B.2.2: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.2.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.2.3: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
+/-	Habitats Sites	A	The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands located in proximity to the location.
0	LNRs	-	There are no LNRs located in proximity of the location.
-	LWSs	A	A minor negative impact could be expected as the Broad Location partially coincides with 'River Arrow' LWS. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as a small proportion of the Broad Location coincides with traditional orchard and deciduous woodland. <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

B.2.4 SA Objective 4: Landscape

Table B.2.4: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 13m from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Wooded Estatelands local character area which has been identified as suitable for enhancement. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>

Score	SA4: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
-	Landscape Sensitivity	A/M	Includes less than 50% area of 'high' and 'high/medium' landscape sensitivity. Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.
-	Special Landscape Areas	M	The Broad Location wholly coincides with 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRoW Users	M	Coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. Mitigation: Mitigate through use of landscape-led site design practices.
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.2.5 SA Objective 5: Cultural Heritage

Table B.2.5: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
--	Grade I Listed Building	A	Likely major negative impact on the setting of the 'Church of St Mary the Virgin Dovecote', which is located 20m from the Broad Location. <i>Mitigation: This feature lies outside the Broad Location. It is possible that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
--	Grade II* Listed Building	A	Potential major negative impact on the setting of the 'Church of St Mary the Virgin', which is located 25m from the Broad Location. <i>Mitigation: This feature lies outside the Broad Location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
-	Grade II Listed Building	A	Potential minor negative impact on the settings of various Grade II Listed Buildings located within 100m of the location, such as: 'Church of St Mary the Virgin Churchyard Cross approximately 10 Metres West' 'Shepherds Yard' and 'Glebe Farm Barn and Attached Animal Housing Approximately 20 Metres West of Farmhouse'. <i>Mitigation: These features lie outside the Broad Location. It is likely that impacts on the significance of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
-	Scheduled Monument	M	The 'Medieval settlement at Mill Ford Farm' SM lies approximately 230m north of the Broad Location and the 'Beauchamp Court moated site' SM lies approximately 270m to the west. While the local context to these heritage assets includes areas of residential and commercial development, there is the potential for large scale residential development to impact on the significance of these features.

Score	SA5: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
			<i>Mitigation: Further information is required to understand the significance of these heritage features and their settings.</i>

B.2.6 SA Objective 6: Pollution

Table B.2.6: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	The Broad Location lies between the River Alne and River Arrow. The construction and occupation of large scale residential development has the potential for a minor negative impact on watercourse quality. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.2.7 SA Objective 7: Natural Resources

Table B.2.7: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on ALC Grade 3 land. If the land in the location is found to be Grade 3a there would be a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the majority of the Broad Location coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.2.8 SA Objective 8: Waste

Table B.2.8: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.2.9 SA Objective 9: Housing

Table B.2.9: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.2.10 SA Objective 10: Health

Table B.2.10: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is the Alexandra Hospital located in Redditch, approximately 5.8km to the north. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	A minor positive impact would be expected as a proportion of the Broad Location is located within the target distance to a GP Surgery.
++	Access to Leisure Facilities	-	A major positive impact on health could be expected as majority of the Broad Location is within the sustainable target distance to leisure facilities at 'The Greig Leisure Centre'.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

B.2.11 SA Objective 11: Accessibility

Table B.2.11: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially within the target distance to a bus stop providing regular services. <i>Mitigation: Public transport improvement schemes and active travel measures.</i>
-	Railway Station	M	Wholly located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
-	Connectivity	M	A large proportion of the Broad Location lies within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>

Score	SA11: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
+	Food stores	-	A large proportion is located within the sustainable target distance to these facilities. A minor positive impact on access to food stores could be expected.

B.2.12 SA Objective 12: Education

Table B.2.12: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the location is within the sustainable target distance to the nearest primary school.
+	Access to Secondary School	-	A minor positive impact could be expected as the location is within the sustainable target distance to the nearest secondary school.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.2.13 SA Objective 13: Economy

Table B.2.13: The assessment of Broad Location at 'Alcester Northeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ALCESTER NORTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Alcester.

B.3 Alcester South



Figure B.3.1: Broad Location at 'Alcester South' with selected constraints

B.3.1 SA Objective 1: Climate Change

Table B.3.1: The assessment of Broad Location at 'Alcester South' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.3.2 SA Objective 2: Flood Risk

Table B.3.2: The assessment of Broad Location at 'Alcester South' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.3.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.3.3: The assessment of Broad Location at 'Alcester South' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 18km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	The ancient woodland 'Oversley Wood' is located approximately 85m to the south of the location. A minor negative impact on this ancient woodland could be expected. <i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs located in proximity of the location.
-	LWSs	A	A minor negative impact could be expected as the Broad Location at 'Alcester South' partially coincides with 'Oversley Mill Flood Meadows' LWS. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as the Broad Location coincides with 'deciduous woodland'. <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

B.3.4 SA Objective 4: Landscape

Table B.3.4: The assessment of Broad Location at 'Alcester South' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
0	National Landscapes/AONBs	-	Located approximately 12m from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden River Valleys and Wooded Estatelands local character area which has been identified

Score	SA4: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
			as suitable for enhancement. The Broad Location could be discordant with these local character areas. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	A/M	Includes less than 50% area of 'high' landscape sensitivity. NB landscape assessment information not available for large parts of the BL. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	The Broad Location wholly coincides with 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Parks	-	There are no Country Parks in proximity to the location.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.3.5 SA Objective 5: Cultural Heritage

Table B.3.5: The assessment of Broad Location at 'Alcester South' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
-	Grade I Listed Building	A	The Broad Location is located approximately 510m from Grade I Listed Building 'Church of St Mary the Virgin Dovecote Approximately 105 Metres Northeast'. On a precautionary basis that needs to be verified through fieldwork, a minor negative impact upon the setting of this Grade I Listed Building could be expected. <i>Mitigation: This feature lies outside the Broad Location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
-	Grade II* Listed Building	A	Not located in close proximity to any Grade II* Listed Buildings. On a precautionary basis that needs to be verified through fieldwork, a minor negative impact upon the setting of this Grade II* Listed Building could be expected. <i>Mitigation: This feature lies outside the Broad Location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
-	Grade II Listed Building	A	Potential minor negative impact on the settings of various Grade II Listed Buildings located within 100m of the location, such as 'Barn approximately 30 metres west of The Granary', 'Hoo Mill', and 'Oversley Grange'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	A	A minor negative impact on the setting of CAs can be expected as 'Alcester' and 'Arrow' CAs are located less than 310m from the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

Score	SA5: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
-	Scheduled Monument	A	The Broad Location is located approximately 110m from 'Roman Town' SM and 250m from 'Oversley Castle' SM. A minor negative impact on the settings of these SMs and on local cultural heritage could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.3.6 SA Objective 6: Pollution

Table B.3.6: The assessment of Broad Location at 'Alcester South' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact could be expected as the Broad Location coincides with the A46 and is located adjacent to the A435. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	The Broad Location is located adjacent to the River Arrow. A minor negative impact on watercourse quality could be expected upon development at this location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.3.7 SA Objective 7: Natural Resources

Table B.3.7: The assessment of Broad Location at 'Alcester South' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly upon ALC Grade 3 land, with a small proportion located upon Grade 4 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resources. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	The majority of the Broad Location coincides with an MSA. A minor negative impact on natural resources could be expected upon development of this location due to the potential for sterilisation of minerals. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.3.8 SA Objective 8: Waste

Table B.3.8: The assessment of Broad Location at 'Alcester South' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.3.9 SA Objective 9: Housing

Table B.3.9: The assessment of Broad Location at 'Alcester South' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.3.10 SA Objective 10: Health

Table B.3.10: The assessment of Broad Location at 'Alcester South' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
-	NHS Hospital with A&E Department	M	The Broad Location is located approximately 8.5km from Alexandra Hospital. Development at this Broad Location could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	A minor positive impact would be expected as a proportion of the Broad Location is located within the target distance to a GP Surgery.
++	Access to Leisure Facilities	-	A major positive impact on health could be expected as a large proportion of the Broad Location is located within the sustainable target distance to 'The Greig Leisure Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact could be expected as the Broad Location coincides with the A46 and is located adjacent to the A435. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

B.3.11 SA Objective 11: Accessibility

Table B.3.11: The assessment of Broad Location at 'Alcester South' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
-	Railway Station	M	Wholly located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
0	Connectivity	-	Unlikely to have an impact on transport as a large proportion of the Broad Location lies within an area identified as having moderate connectivity to the existing settlement (Grade C).
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores could be expected.

B.3.12 SA Objective 12: Education

Table B.3.12: The assessment of Broad Location at 'Alcester South' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the location is within the sustainable target distance to the nearest primary school.
+	Access to Secondary School	-	A minor positive impact would be expected as the location is within the sustainable target distance to at least one of the three secondary schools in Alcester: 'Alcester Grammar School'; 'St Benedict's Catholic High School'; and 'Alcester Academy'.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.3.13 SA Objective 13: Economy

Table B.3.13: The assessment of Broad Location at 'Alcester South' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ALCESTER SOUTH: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Alcester.

B.4 Alcester West

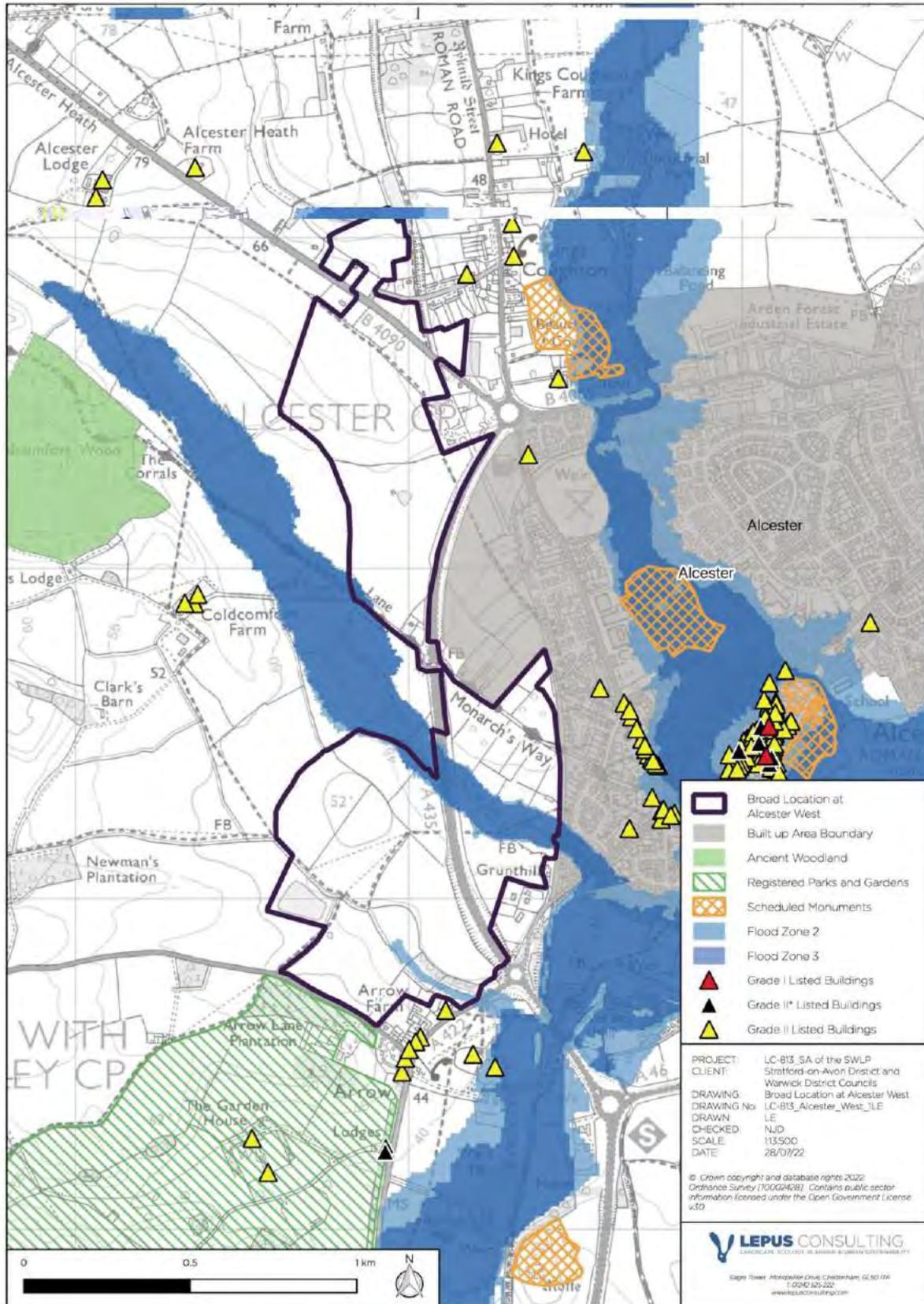


Figure B.4.1: Broad Location at 'Alcester West' with selected constraints

B.4.1 SA Objective 1: Climate Change

Table B.4.1: The assessment of Broad Location at 'Alcester West' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.4.2 SA Objective 2: Flood Risk

Table B.4.2: The assessment of Broad Location at 'Alcester West' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.4.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.4.3: The assessment of Broad Location at 'Alcester West' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Bredon Hill' SAC located approximately 18km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	A/M	<p>Ancient woodland 'Cold Comfort' is located approximately 420m from the location and is separated from the location by open countryside.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals. Design green edges to any new development.</i></p>
0	LNRs	-	It is unlikely that the Broad Location would have a significant impact on LNRs. 'River Arrow' LNR is located 320m from the Broad Location but is separated by built form.
-	LWSs	A	A minor negative impact could be expected as the Broad Location coincides with 'Cold Comfort Lane Orchard', 'Field at Alcester' and 'River Arrow' LWSs. Additionally, 'Arrowlane Plantation' and 'Co-operative Meadow' LWSs are located adjacent to the Broad Location.

Score	SA3: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as the Broad Location coincides with 'deciduous woodland'. <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

B.4.4 SA Objective 4: Landscape

Table B.4.4: The assessment of Broad Location at 'Alcester West' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 13km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Wooded Estate lands local character area. The Broad Location could be discordant with the features of this large local character area which include large woodlands, rising ground, mature hedgerows, roadside oaks, semi-regular pattern of medium – large fields, varied settlement form in the villages and scattered farmsteads. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	A/M	Includes areas 'medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	The majority of the Broad Location coincides with 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Parks	-	There are no Country Parks in proximity to the location.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.4.5 SA Objective 5: Cultural Heritage

Table B.4.5: The assessment of Broad Location at 'Alcester West' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.

Score	SA5: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
-	Grade II Listed Building	A	A minor negative impact on the settings of several Grade II Listed Buildings located within 100m of the location have been identified including 'Minerva Needle Works', '4-6 Arrow Alcester' and '10-12 Arrow Alcester'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Registered Parks and Gardens	A	The Broad Location is located 15m from Ragley Hall RPG. A minor negative impact could be expected due to the proximity to the RPG. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Conservation Area	A	Located adjacent to 'Arrow' CA and is located 270m from 'Alcester' CA. A minor negative impact on the setting of these CAs could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Scheduled Monument	A	The Broad Location is located approximately 200m from 'Beauchamp Court moated site' SM and 290m from 'Alcester Abbey' SM, separated predominantly by open space. Due to the close proximity to these heritage assets, the Broad Location could have a minor negative impact on the settings of these SMs and on local cultural heritage. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.4.6 SA Objective 6: Pollution

Table B.4.6: The assessment of Broad Location at 'Alcester West' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact could be expected as the Broad Location coincides with the A435, and development would be likely to expose some end users to higher levels of transport-associated air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	A/M	The Broad Location coincide with Spittle Brook and there is the potential for a minor negative impact on watercourse quality. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.4.7 SA Objective 7: Natural Resources

Table B.4.7: The assessment of Broad Location at 'Alcester West' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on ALC Grade 3 land. If the land in the location is found to be Grade 3a there would be a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>

Score	SA7: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the majority of the Broad Location coincides entirely with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.4.8 SA Objective 8: Waste

Table B.4.8: The assessment of Broad Location at 'Alcester West' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.4.9 SA Objective 9: Housing

Table B.4.9: The assessment of Broad Location at 'Alcester West' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.4.10 SA Objective 10: Health

Table B.4.10: The assessment of Broad Location at 'Alcester West' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is the Alexandra Hospital located in Redditch, approximately 5.9km to the north. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
++	Access to Leisure Facilities	-	A major positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'The Greig Leisure Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.

Score	SA10: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
-	Main Road	A/M	A minor negative impact on air quality and noise pollution could be expected as the A435 runs through and adjacent to the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected at this Broad Location.

B.4.11 SA Objective 11: Accessibility

Table B.4.11: The assessment of Broad Location at 'Alcester West' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is located partially within the target distance to a bus stop providing regular services.
-	Railway Station	M	Wholly located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
-	Connectivity	M	A large proportion of the Broad Location lies within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.4.12 SA Objective 12: Education

Table B.4.12: The assessment of Broad Location at 'Alcester West' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the location is within the sustainable target distance to the nearest primary school.
+	Access to Secondary School	-	A minor positive impact could be expected as the location is within the sustainable target distance to at least one of the three secondary schools in Alcester: 'Alcester Grammar School'; 'St Benedict's Catholic High School'; and 'Alcester Academy'.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.4.13 SA Objective 13: Economy

Table B.4.13: The assessment of Broad Location at 'Alcester West' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ALCESTER WEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Alcester.

B.5 Kenilworth North

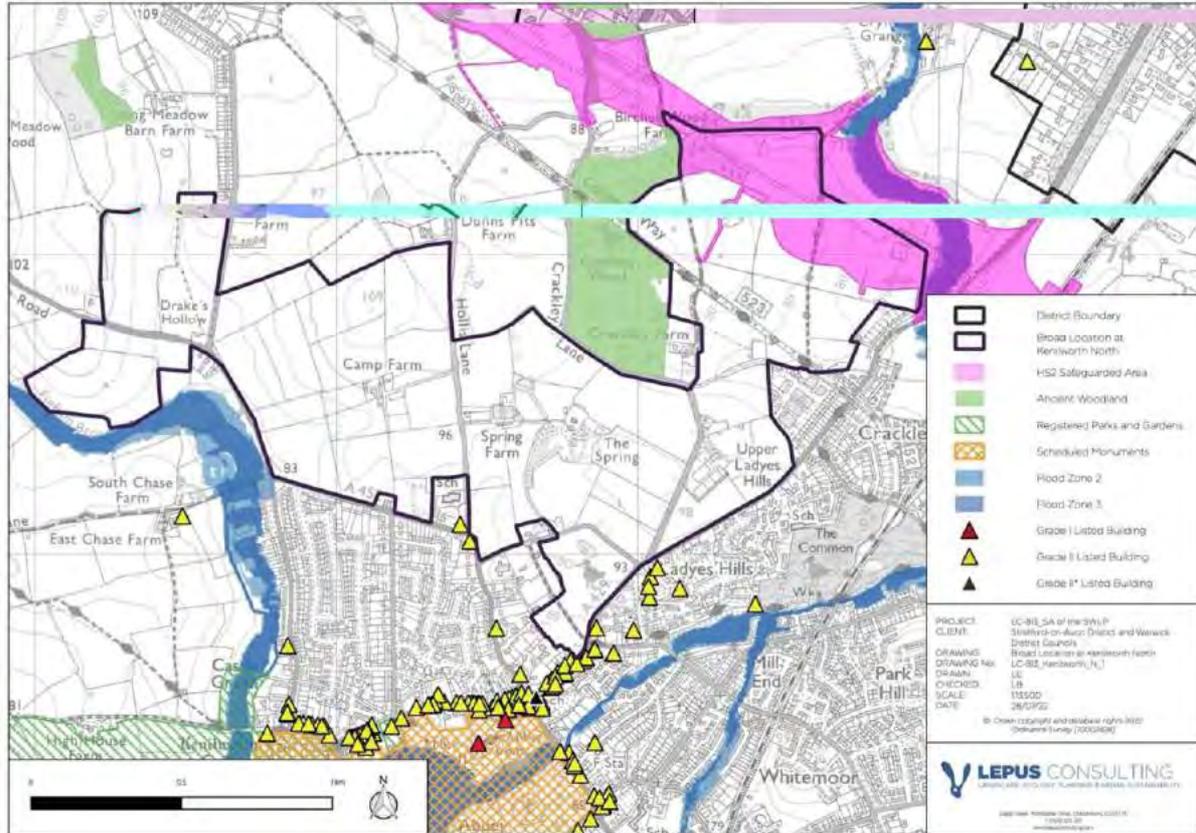


Figure B.5.1: Broad Location at 'Kenilworth North' with selected constraints

B.5.1 SA Objective 1: Climate Change

Table B.5.1: The assessment of Broad Location at 'Kenilworth North' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
---	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.5.2 SA Objective 2: Flood Risk

Table B.5.2: The assessment of Broad Location at 'Kenilworth North' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.5.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.5.3: The assessment of Broad Location at 'Kenilworth North' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 16km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	A minor negative impact could be expected as the ancient woodland 'Crackley Wood North' is located adjacent to the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
--	LNRs	A	A major negative impact could be expected as the Broad Location coincide with 'Parliament Piece' LNR. The Broad Location is also located adjacent to 'Crackley Wood' LNR. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	LWSs	A	A minor negative impact could be expected as the Broad Location coincides with 'Kenilworth Greenway' LWS. Various LWSs are located adjacent to the Broad Location such as: 'Finham & Inchford Brook' and 'Finham Brook Meadows and Wood'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as the Broad Location coincides with 'deciduous woodland' and 'traditional orchard' <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

B.5.4 SA Objective 4: Landscape

Table B.5.4: The assessment of Broad Location at 'Kenilworth North' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
0	National Landscapes/AONBs	-	Located approximately 25km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.

Score	SA4: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which has been identified as suitable for enhancement. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		There is no landscape sensitivity information for this location. The proposed High Speed 2 railway is likely to coincide with the broad location. This will affect existing levels of landscape sensitivity possibly in an adverse way.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.5.5 SA Objective 5: Cultural Heritage

Table B.5.5: The assessment of Broad Location at 'Kenilworth North' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
--	Grade I Listed Building	A	Located in close proximity to Grade I Listed Buildings including Kenilworth Castle, Abbey Ruins and Church of St Nicholas. Development at the Broad Location would be expected to have a major negative impact on the setting of these Grade I Listed Buildings. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Grade II* Listed Building	-	The Grade II* Listed Building 'Abbotsford School' is located within close proximity to the Broad Location. Due to the nature of this Listed Building and its current setting within an urbanised area, development at the Broad Location would be expected to have a negligible impact on the setting of Abbotsford School.
-	Grade II Listed Building	A	Potential minor negative impact on the settings of various Grade II Listed Buildings located within 100m of the location, such as 'Ivy Cottages', 'Rosebank Southbank', and 'The Old Manor' <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Registered Parks and Gardens	M	Registered Parks and Gardens 'Kenilworth Castle' and 'Garden 1 at Castle Hill' are approximately 650m from the Broad Location. A minor negative impact would be expected on the setting of Kenilworth Castle, due to the majority of the RPG being separated from the Broad Location by greenfield and farmland. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this RPG.</i>

Score	SA5: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
-	Conservation Area	M	Coincides with 'Fieldgate Lane' and 'Upper Spring Lane and Tainters Hill' CAs ¹ . A minor negative impact on the setting of these CAs would be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
-	Scheduled Monument	M	'Kenilworth Abbey' SM is located approximately 240m from the Broad Location. As the SM is separated from the Broad Location by built form, a negligible impact could be expected on the settings of the SMs and on local cultural heritage. However, 'Kenilworth Castle' is located approximately 830m from the Broad Location. Given the nature of this Scheduled Monument, a minor negative impact may be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this SM.</i>

B.5.6 SA Objective 6: Pollution

Table B.5.6: The assessment of Broad Location at 'Kenilworth North' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
-	AQMA	A/M	'New Street (Kenilworth)' AQMA is located approximately 85m from the Broad Location. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact has been identified. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on air quality and noise pollution could be expected as the A452 coincides with the location and the A429 is located adjacent to the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	M	Not within 200m of an existing railway line but the BL is adjacent to the HS2 high speed rail line. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality.</i>
-	Watercourses	A/M	Finham Brook and Canley Brook are located less than 200m from the Broad Location. There is the potential for a minor negative impact on watercourse quality. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
-	Groundwater SPZ	M	The Broad Location coincide with Groundwater SPZ 1, 2 and 3. Development could have a minor negative impact Ground water SPZs

¹ Warwick District Council (2007) A Guide to Conservation Areas. Available at: [https://www.warwickdc.gov.uk/downloads/id/3080/kenilworth - guide to conservations areas.pdf](https://www.warwickdc.gov.uk/downloads/id/3080/kenilworth_-_guide_to_conservations_areas.pdf) [Date Accessed: 23/09/22].

Score	SA6: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
			<i>Mitigation: Appropriate management of construction and appropriate design measures to prevent pollution of the groundwater.</i>

B.5.7 SA Objective 7: Natural Resources

Table B.5.7: The assessment of Broad Location at 'Kenilworth North' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on ALC Grade 2 and Grade 3 land. Development on Grade 2 or Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the majority of the Broad Location coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.5.8 SA Objective 8: Waste

Table B.5.8: The assessment of Broad Location at 'Kenilworth North' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.5.9 SA Objective 9: Housing

Table B.5.9: The assessment of Broad Location at 'Kenilworth North' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.5.10 SA Objective 10: Health

Table B.5.10: The assessment of Broad Location at 'Kenilworth North' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
-	NHS Hospital with A&E Department	M	The Broad Location is located approximately 6.8km from Warwick Hospital. Development at this Broad Location could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact.

Score	SA10: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
			<i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
+	Access to Leisure Facilities	-	A minor positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'Meadow Community Sports Centre' leisure facility.
-	AQMA	M	'New Street (Kenilworth)' AQMA is located approximately 85m from the Broad Location. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on air quality and noise pollution could be expected as the A452 is located adjacent to the southeast boundary of the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

B.5.11 SA Objective 11: Accessibility

Table B.5.11: The assessment of Broad Location at 'Kenilworth North' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the Broad Location is located within the target distance to a bus stop providing regular services.
+	Railway Station	-	A minor positive impact could be expected as the Broad Location is located within the target distance to a railway station.
+	Connectivity	-	A large proportion of the Broad Location lies within an area identified as having good connectivity to the existing settlement (predominantly grade B with partial Grade A). A minor positive impact on transport could be expected.
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.5.12 SA Objective 12: Education

Table B.5.12: The assessment of Broad Location at 'Kenilworth North' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as a large proportion of the Broad Location is located within the sustainable target distance to 'St Augustine's Catholic Primary School' and 'Priors Field Primary School'.
+	Access to Secondary School	-	A minor positive impact would be expected as the Broad Location is located within the sustainable target distance to 'Kenilworth School and Sixth Form'.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.5.13 SA Objective 13: Economy

Table B.5.13: The assessment of Broad Location at 'Kenilworth North' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KENILWORTH NORTH: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Kenilworth.

B.6 Kenilworth Northeast

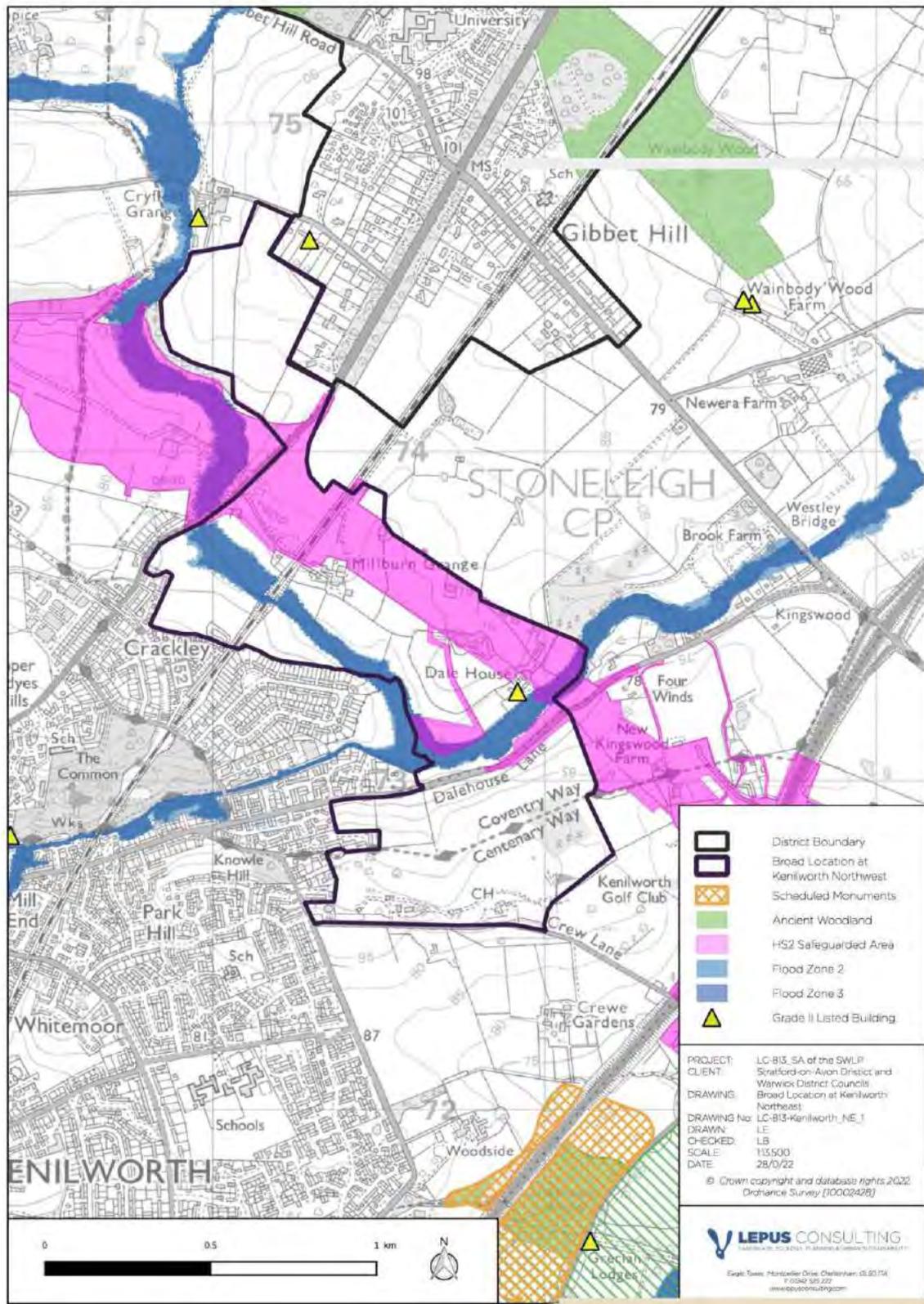


Figure B.6.1: Broad Location at 'Kenilworth Northeast' with selected constraints

B.6.1 SA Objective 1: Climate Change

Table B.6.1: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.6.2 SA Objective 2: Flood Risk

Table B.6.2: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.6.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.6.3: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 16km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
-	LNRs	A	<p>A minor negative impact could be expected as the 'Wainbody Wood & Stivichall Common, Kenilworth Road Spinney' LNR is located 30m from the Broad Location.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
-	LWSs	A	<p>A minor negative impact could be expected as the Broad Location coincides with 'Dalehouse Lane' and 'River Sowe & Finham Brook & Lakes' LWSs.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	The Broad Location does not coincide with any LGSs.

Score	SA3: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
-	Priority Habitats	A	A minor negative impact could be expected as the Broad Location coincides with 'deciduous woodland'. <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

B.6.4 SA Objective 4: Landscape

Table B.6.4: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 24km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which has been identified as suitable for enhancement. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		There is no landscape sensitivity information for this location. The proposed High Speed 2 railway is likely to coincide with the broad location. This will affect existing levels of landscape sensitivity possibly in an adverse way.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with a PRow footpath. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	Development in this Broad Location could increase the risk of coalescence with Coventry which could have a minor negative impact on the surrounding landscape. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

B.6.5 SA Objective 5: Cultural Heritage

Table B.6.5: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
0	Grade I Listed Building	-	There are no Grade I Listed Building in proximity of the location.
0	Grade II* Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
--	Grade II Listed Building	A	Potential major negative impact on the setting of Grade II Listed Building 'Dale House Farmhouse' which coincides with the Broad Location. Minor negative impacts would also be expected on the setting of Grade II Listed Buildings 'Cryfield Grange Farmhouse' and 'South Winds' which are within close proximity to the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

Score	SA5: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
0	Scheduled Monument	-	The Broad Location is approximately 450m from 'Roman Settlement at Glasshouse Wood'. Due to the nature and location of this Scheduled Monument, which coincides with the A46, development at the Broad Location would have a negligible impact on the setting and character of this Scheduled Monument.

B.6.6 SA Objective 6: Pollution

Table B.6.6: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
-	AQMA	A/M	'Coventry City-Wide' AQMA is located in close proximity to the Broad Location. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact has been identified. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on air quality and noise pollution could be expected as the A46 is coincides with the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	M	The HS2 high speed rail line and an existing railway line runs through the northern part of the Broad Location, and development at the Broad Location would be likely to expose some end users to higher levels of transport-associated air and noise pollution, resulting in a minor negative impact. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Watercourses	M	The Broad Location coincides with Finham Brook and Canley Brook. There is the potential for a minor negative impact on watercourse quality as a result of development at the Broad Location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
-	Groundwater SPZ	M	The Broad Location coincides with Groundwater SPZ 3. Development could have a minor negative impact ground water SPZs <i>Mitigation: Appropriate management of construction and appropriate design measures to prevent pollution of the groundwater.</i>

B.6.7 SA Objective 7: Natural Resources

Table B.6.7: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 7 (Natural

Resources)

Score	SA7: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on ALC Grade 2 and Grade 3 land. Development on Grade 2 or Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the majority of the Broad Location coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.6.8 SA Objective 8: Waste

Table B.6.8: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.6.9 SA Objective 9: Housing

Table B.6.9: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.6.10 SA Objective 10: Health

Table B.6.10: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
-	NHS Hospital with A&E Department	M	The Broad Location is located approximately 6.8km from Warwick Hospital. Development at this Broad Location could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel</i>

Score	SA10: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
			<i>options for residents to access the nearest GP surgeries for these services.</i>
+	Access to Leisure Facilities	-	A minor positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'Meadow Community Sports Centre' leisure facility.
-	AQMA	M	'Coventry City-Wide' AQMA is located adjacent to the Broad Location. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on air quality and noise pollution could be expected as the A429 coincides with the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

B.6.11 SA Objective 11: Accessibility

Table B.6.11: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
+	Railway Station	-	The Broad Location is within the sustainable target distance to a railway station. A minor positive impact on site end users' access to rail services is expected.
-	Connectivity	M	A large proportion of the Broad Location lies within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	The Broad Location is within the target distance to a food store. A minor positive impact would be expected on access to food stores for site end users.

B.6.12 SA Objective 12: Education

Table B.6.12: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the majority of the location is within the sustainable target distance from the nearest primary school 'Park Hill Junior School'.
+	Access to Secondary School	-	A minor positive impact would be expected as the majority of the location is within the sustainable target distance from the secondary school 'Kenilworth School and Sixth Form'.

Score	SA12: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.6.13 SA Objective 13: Economy

Table B.6.13: The assessment of Broad Location at 'Kenilworth Northeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KENILWORTH NORTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Kenilworth.

B.7 Kenilworth Northwest

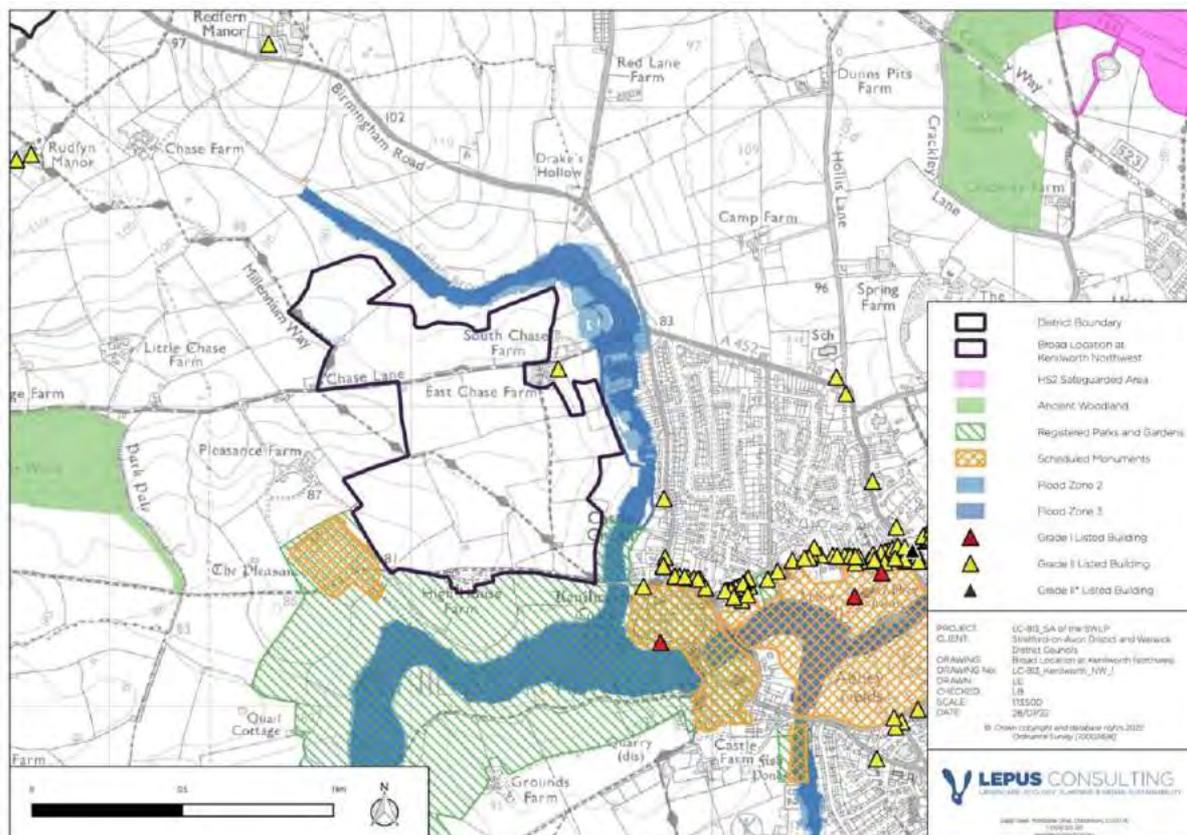


Figure B.7.1: Broad Location at 'Kenilworth Northwest' with selected constraints

B.7.1 SA Objective 1: Climate Change

Table B.7.1: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver approximately 1,400 or more dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.7.2 SA Objective 2: Flood Risk

Table B.7.2: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.7.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.7.3: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 18km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Not located within a SSSI IRZ.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact could be expected as the Broad Location is adjacent to 'Finham & Inchford Brook', 'Finham Brook Meadow and Wood', 'Finham Brook Meadows' and 'The Pleasance' LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
0	Priority Habitats	-	Development proposal does not coincide with a priority habitat.

B.7.4 SA Objective 4: Landscape

Table B.7.4: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 26km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which has been identified as suitable for enhancement. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>

Score	SA4: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.7.5 SA Objective 5: Cultural Heritage

Table B.7.5: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
--	Grade I Listed Building	A	Grade I Listed Building 'Kenilworth Castle' is located approximately 290m from the location and is separated from the location by open space. Development on this location result in a major negative impact on the setting of 'Kenilworth Castle'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Grade II* Listed Building	-	There are no Grade II* Listed Building in proximity of the location.
-	Grade II Listed Building	A	Potential minor negative impact on the settings of various Grade II Listed Buildings located within 250m of the Broad Location, such as 'Harvest House Tyroes' 'Purlieu Gate Cottage', and A group of Listed Grade II Listed Buildings along Clinton Lane. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
--	Registered Parks and Gardens	A	The RPG 'Kenilworth Castle' is located adjacent to the location. Development would result in a major negative impact on the setting of this RPG. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Conservation Area	A	A minor negative impact could be expected as the Clinton Road Conservation Area is located approximately 150m from the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
--	Scheduled Monument	A	The SM 'The Pleasance moated site' is located adjacent to the location and the SM 'Kenilworth Castle: a motte and bailey and enclosure castle with mere, dams and 16th century gardens' is located less than 130m from the location, separated by open space. Development at this Broad Location could result in a major negative impact on the setting of 'The Pleasance Moat'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.7.6 SA Objective 6: Pollution

Table B.7.6: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Finham Brook runs adjacent to, and slightly coincides with the Broad Location. There is the potential for a minor negative impact on watercourse quality. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
-	Groundwater SPZ	M	A large proportion of the location coincides with Groundwater SPZ 3 and development could result in a minor negative impact on groundwater. <i>Mitigation: Appropriate management of construction and appropriate design measures to prevent pollution of the groundwater.</i>

B.7.7 SA Objective 7: Natural Resources

Table B.7.7: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on Grade 3 land. Development on Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location wholly coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.7.8 SA Objective 8: Waste

Table B.7.8: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 1,400 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.7.9 SA Objective 9: Housing

Table B.7.9: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 1,400 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.7.10 SA Objective 10: Health

Table B.7.10: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
-	NHS Hospital with A&E Department	M	The Broad Location is located approximately 6.6km from Warwick Hospital. Development at this Broad Location could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	A minor negative impact could be expected as the Broad Location is wholly outside the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure centres for these services.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network but no connectivity exists to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.7.11 SA Objective 11: Accessibility

Table B.7.11: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
+	Railway Station	-	The Broad Location is within the sustainable target distance to a railway station. A minor positive impact on site end users' access to rail services is expected.
-	Connectivity	M	A large proportion of the Broad Location lies within an area identified as having poor connectivity to the existing

Score	SA11: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
			settlement (predominantly Grade D with Grade C). A minor negative impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	A large proportion is within the sustainable target distance to food stores. A minor positive impact on access to food stores could be expected.

B.7.12 SA Objective 12: Education

Table B.7.12: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the Broad Location is within the sustainable target distance of 'Priors Field' Primary School.
-	Access to Secondary School	M	A minor negative impact would be expected as the Broad Location is outside of the sustainable target distance to any secondary schools. <i>Mitigation: Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.7.13 SA Objective 13: Economy

Table B.7.13: The assessment of Broad Location at 'Kenilworth Northwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KENILWORTH NORTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Kenilworth.

B.8 Kenilworth South

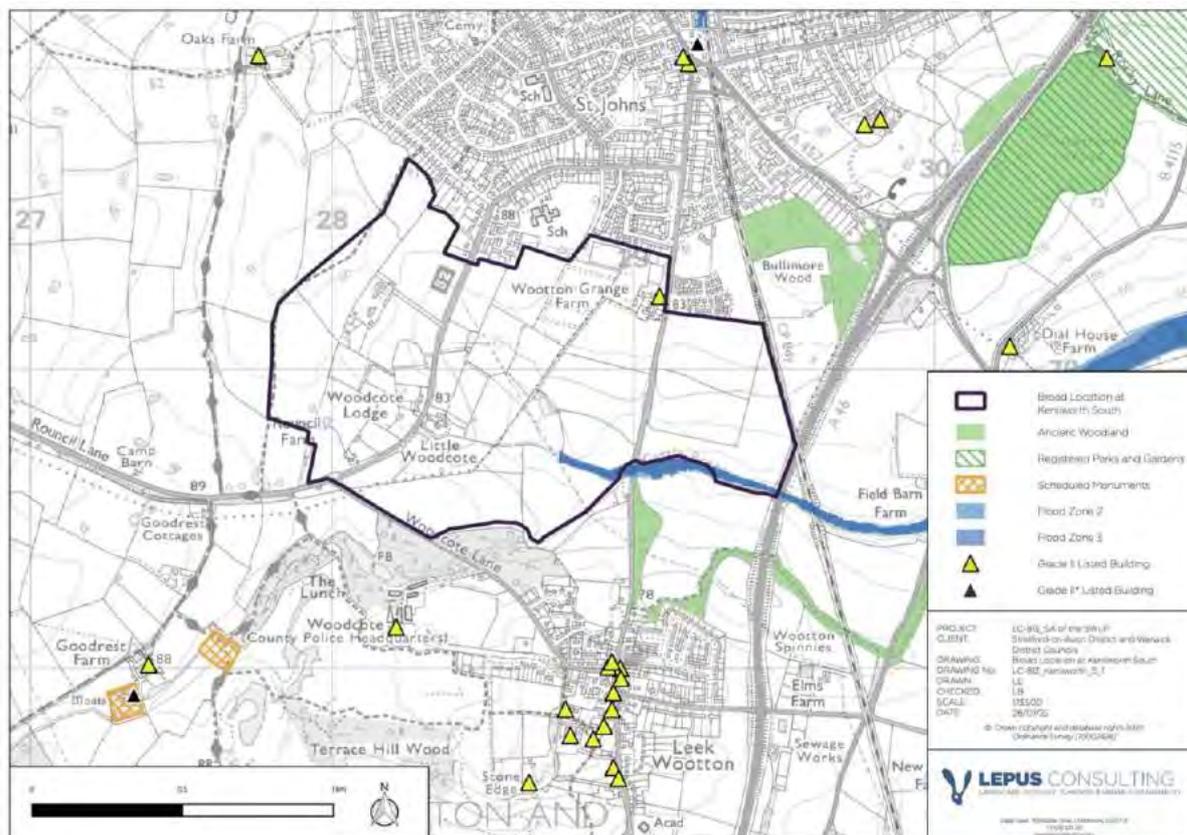


Figure B.8.1: Broad Location at 'Kenilworth South' with selected constraints

B.8.1 SA Objective 1: Climate Change

Table B.8.1: The assessment of Broad Location at 'Kenilworth South' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
---	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.8.2 SA Objective 2: Flood Risk

Table B.8.2: The assessment of Broad Location at 'Kenilworth South' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.8.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.8.3: The assessment of Broad Location at 'Kenilworth South' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 21km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Not located within a SSSI IRZ.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	A minor negative impact could be expected as the ancient woodland 'Wootton Spinneys' is located approximately 60m from the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact could be expected as the Broad Location coincides with 'Rounds Hill Lane Verge', 'River Avon and Tributaries' and 'Cattle Brook' LWSs. The location is also located in adjacent to 'The Lunch'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland' and 'traditional orchard'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.8.4 SA Objective 4: Landscape

Table B.8.4: The assessment of Broad Location at 'Kenilworth South' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
0	National Landscapes/AONBs	-	Located approximately 22km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which includes remnant deer parks, ancient woodlands and

Score	SA4: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
			ancient pollard oaks. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRoW Users	M	Coincides with a PRoW footpath. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development on this Broad Location could increase the risk of coalescence with Leek Wootton village. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

B.8.5 SA Objective 5: Cultural Heritage

Table B.8.5: The assessment of Broad Location at 'Kenilworth South' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A	Potential major negative impact on the settings of Grade II Listed Building 'Wootton Grange Farmhouse' which coincides with the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
0	Scheduled Monument	-	'Wedgnock Park' is located approximately 600m from the Broad Location with little intervening built form. Due to the nature of this Scheduled Monument, a negligible impact as a result of development at the Broad Location would be expected.

B.8.6 SA Objective 6: Pollution

Table B.8.6: The assessment of Broad Location at 'Kenilworth South' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on could be expected as the A46 is located adjacent to the southeast boundary of the location and development would be likely to expose some site end users to air and noise pollution from traffic. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of</i>

Score	SA6: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
			<i>green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	A minor negative impact could be expected as a railway line runs adjacent to the eastern boundary of the Broad Location, and development would be likely to expose some end users to higher levels of transport-associated air and noise pollution. <i>Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles</i>
-	Watercourses	M	A minor negative impact on watercourse quality could be expected as the River Avon runs adjacent to the southern boundary of the location and slightly coincides with the location. Cattle Brook also coincides with a proportion of the site in the south. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.8.7 SA Objective 7: Natural Resources

Table B.8.7: The assessment of Broad Location at 'Kenilworth South' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on Grade 3 land. Development on Grade 3 land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location wholly coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.8.8 SA Objective 8: Waste

Table B.8.8: The assessment of Broad Location at 'Kenilworth South' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.8.9 SA Objective 9: Housing

Table B.8.9: The assessment of Broad Location at 'Kenilworth South' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.8.10 SA Objective 10: Health

Table B.8.10: The assessment of Broad Location at 'Kenilworth South' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
++	NHS Hospital with A&E Department	-	A major positive impact on access to healthcare could be expected as the Broad Location is entirely within the target distance to Warwick Hospital.
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure centres for these services.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on would be expected as the A46 is located adjacent to the southeast boundary of the location and development would be likely to expose some site end users to air and noise pollution from traffic. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

B.8.11 SA Objective 11: Accessibility

Table B.8.11: The assessment of Broad Location at 'Kenilworth South' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
+	Railway Station	-	The Broad Location is within the sustainable target distance to a railway station. A minor positive impact on site end users' access to rail services is expected.
+	Connectivity	-	A large proportion of the Broad Location lies within an area identified as having good connectivity to the existing

Score	SA11: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
			settlement (Grade B). A minor positive impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	Located within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.8.12 SA Objective 12: Education

Table B.8.12: The assessment of Broad Location at 'Kenilworth South' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the Broad Location is within the sustainable target distance to 'Clinton Primary School' and 'St John's Primary School'.
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of any secondary schools. <i>Mitigation: Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.8.13 SA Objective 13: Economy

Table B.8.13: The assessment of Broad Location at 'Kenilworth South' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KENILWORTH SOUTH: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Kenilworth.

B.9 Kenilworth Southeast

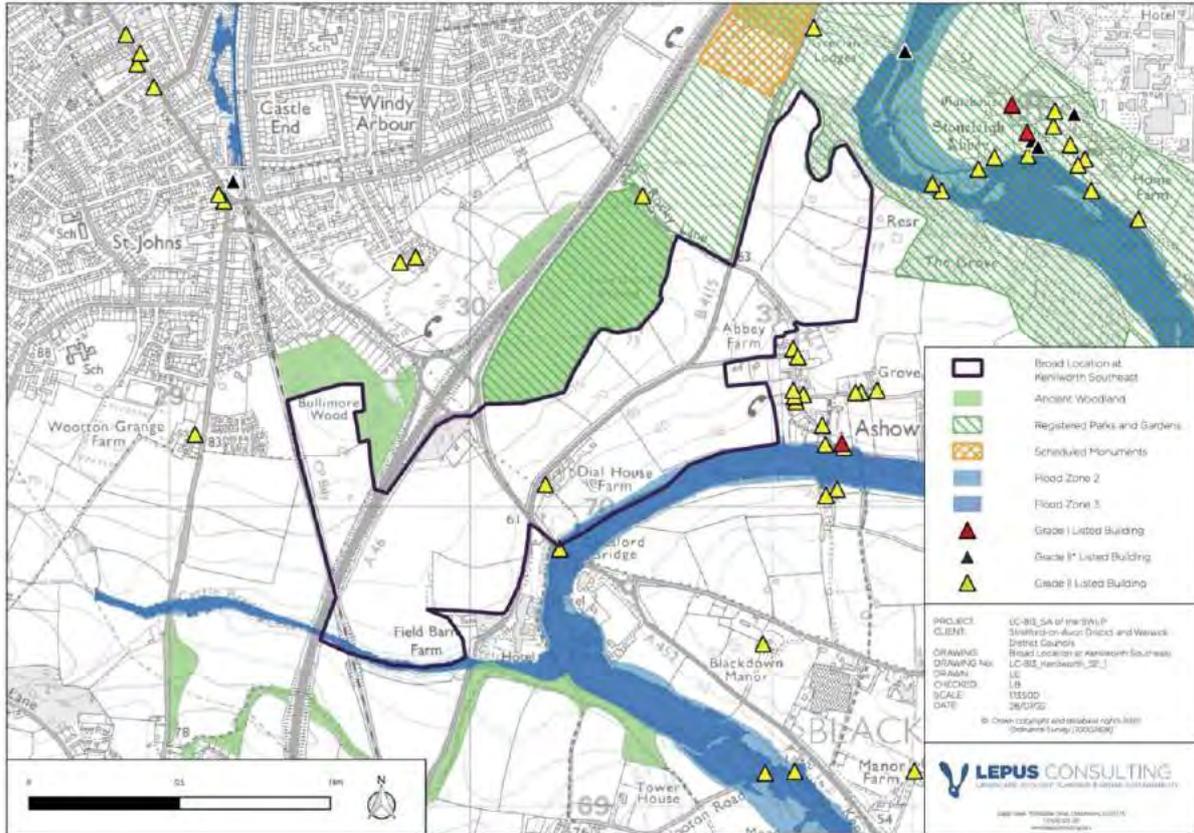


Figure B.9.1: Broad Location at 'Kenilworth Southeast' with selected constraints

B.9.1 SA Objective 1: Climate Change

Table B.9.1: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.9.2 SA Objective 2: Flood Risk

Table B.9.2: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.9.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.9.3: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 19km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	A minor negative impact could be expected as the location is adjacent to 'Thickthorn Wood' and 'Bullimore Wood'. 'Glasshouse Wood' and 'Wootton Spinneys' are approximately 160m from the BL. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact could be expected as the Broad Location coincides with various LWSs such as: 'Bullimore Wood', 'Cattle Brook', 'Abbet Farm Hedge' and 'Wootton Spinneys'. Adjacent to Thickthorn Wood LWS. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.9.4 SA Objective 4: Landscape

Table B.9.4: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 22km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	A/M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which

Score	SA4: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
			includes remnant deer parks, ancient woodlands and ancient pollard oaks. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with a PRow footpath. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development on this Broad Location could increase the risk of coalescence with Ashow village. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

B.9.5 SA Objective 5: Cultural Heritage

Table B.9.5: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
-	Grade I Listed Building	A	Located approximately 200m from the Grade I Listed Building 'Church of the Assumption of Our Lady'. A minor negative impact would be expected as a result of development at the Broad Location on this Grade I Listed Building. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A	Potential major negative impact on the settings of Grade II Listed Building 'Dial House Farmhouse' which coincides with the location. Additionally, various Grade II Listed Buildings are located less than 100m from the location including: 'Chesford Bridge'; 'Fir Tree Cottage'; and 'Trinity Cottage' <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Registered Parks and Gardens	A	A minor negative impact on 'Stoneleigh Abbey' RPG can be expected as it is located adjacent to the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
-	Scheduled Monument	A	A minor negative impact on the setting of 'Roman settlement at Glasshouse Wood' SM could be expected as it is located approximately 60m from the location, separated by open space. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.9.6 SA Objective 6: Pollution

Table B.9.6: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on could be expected as the A46 and the A452 coincide with the location and development at the Broad Location would be likely to expose some site end users to air and noise pollution from traffic. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	A minor negative impact could be expected as a railway line coincides with the Broad Location and runs adjacent to the western boundary of the location, and development would be likely to expose some end users to higher levels of transport-associated air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality.</i>
-	Watercourses	M	A minor negative impact on watercourse quality could be expected as the River Avon runs adjacent to the southern boundary of the location and slightly coincides with the location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.9.7 SA Objective 7: Natural Resources

Table B.9.7: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on Grade 2 and 3 land. Development on Grade 2 or 3 land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location wholly coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.9.8 SA Objective 8: Waste

Table B.9.8: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
--	Potential increase in	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected.

Score	SA8: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
	household waste generation		<i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.9.9 SA Objective 9: Housing

Table B.9.9: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.9.10 SA Objective 10: Health

Table B.9.10: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
++	NHS Hospital with A&E Department	-	A minor positive impact on access to healthcare could be expected as the majority of the Broad Location is situated within the target distance to Warwick Hospital.
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
+	Access to Leisure Facilities	-	A minor positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'Meadow Community Sports Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on could be expected as the A46 and A452 coincides with the location and development would be likely to expose some site end users to air and noise pollution from traffic. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

B.9.11 SA Objective 11: Accessibility

Table B.9.11: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 11

(Accessibility)

Score	SA11: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
+	Bus Stop	-	A minor positive impact could be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
+	Railway Station	-	The Broad Location is within the sustainable target distance to a railway station. A minor positive impact on site end users' access to rail services is expected.
	Connectivity	-	Data not available.
-	Food stores	M	Located wholly outside of the sustainable target distance to these facilities. A minor negative impact on access to food stores could be expected. <i>Mitigation: Potential for food stores to be included within the site layout.</i>

B.9.12 SA Objective 12: Education

Table B.9.12: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
-	Access to Primary School	M	A minor negative impact would be expected as the Broad Location is entirely outside of the sustainable target distance to any primary schools. <i>Mitigation: Potential for primary education provisions within the Broad Location layout.</i>
+	Access to Secondary School	-	A minor positive impact would be expected as the Broad Location is within the sustainable target distance to 'Kenilworth School and Sixth Form'.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.9.13 SA Objective 13: Economy

Table B.9.13: The assessment of Broad Location at 'Kenilworth Southeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KENILWORTH SOUTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Kenilworth.

B.10 Kenilworth West

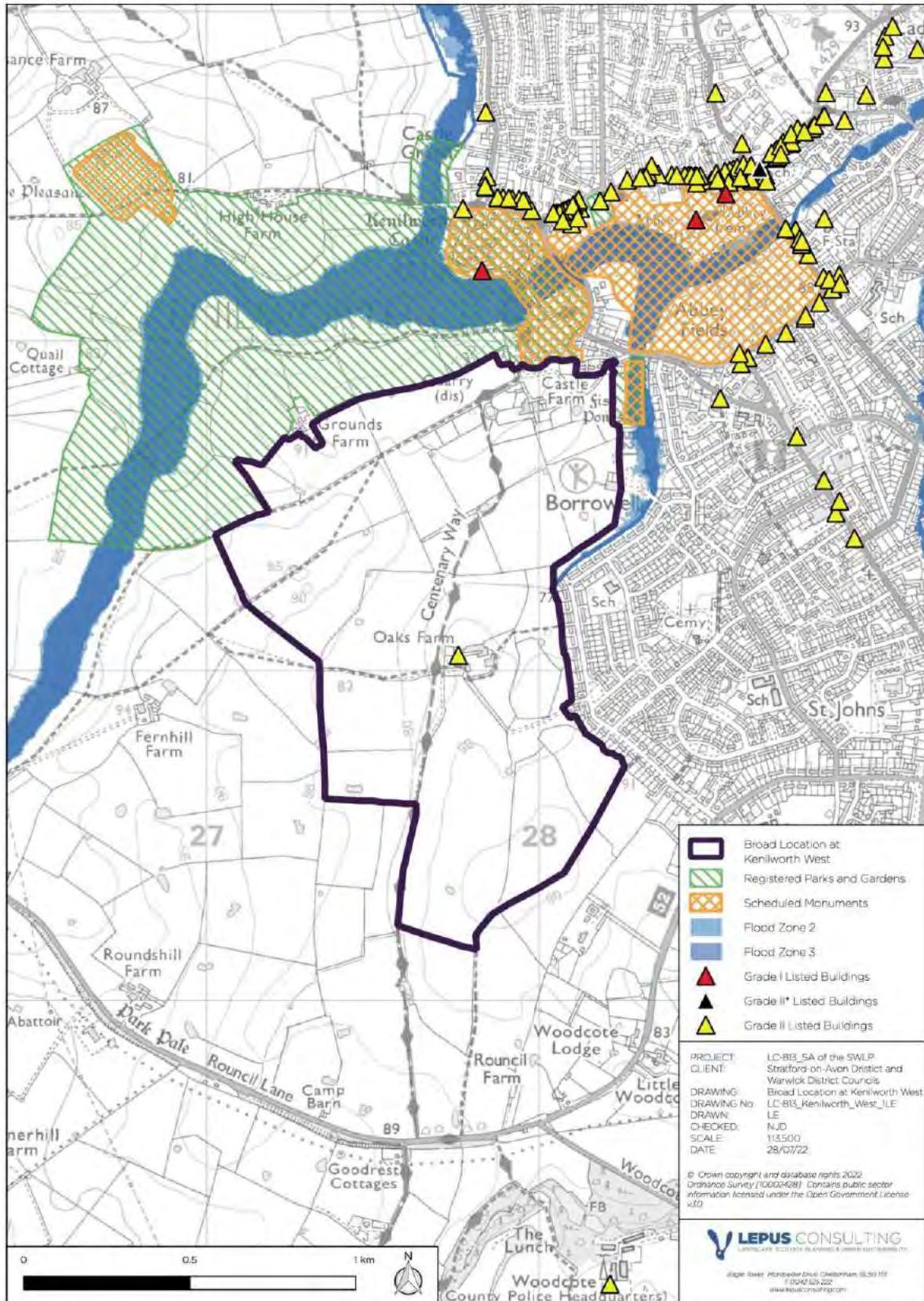


Figure B.10.1: Broad Location at 'Kenilworth West' with selected constraints

B.10.1 SA Objective 1: Climate Change

Table B.10.1: The assessment of Broad Location at 'Kenilworth West' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.10.2 SA Objective 2: Flood Risk

Table B.10.2: The assessment of Broad Location at 'Kenilworth West' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.10.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.10.3: The assessment of Broad Location at 'Kenilworth West' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 19km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Not located within a SSSI IRZ.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	<p>A major negative impact could be expected as the Broad Location coincides with various LWSs including 'Oaks Farm', 'Kenilworth Moss' and 'Inchford Brook Tributary' LWSs.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland'. Other priority habitats are likely to be present such as hedgerows and veteran trees.

Score	SA3: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.10.4 SA Objective 4: Landscape

Table B.10.4: The assessment of Broad Location at 'Kenilworth West' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 24km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	A/M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which has been identified as suitable for enhancement. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRoW Users	M	Coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.10.5 SA Objective 5: Cultural Heritage

Table B.10.5: The assessment of Broad Location at 'Kenilworth West' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
-	Grade I Listed Building	A	A minor negative impact on the setting of the Grade I Listed Building 'Kenilworth Castle' could be expected as it is located approximately 260m from the location, separated by open space. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A	Potential major negative impact on the setting of Grade II Listed Building 'Oaks Farmhouse' which coincides with the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Registered Parks and Gardens	A	A minor negative impact on 'Kenilworth Castle' RPG can be expected as it is located adjacent to the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Conservation Area	A	Located adjacent to 'Forest Road and Castle Road' CA. A minor negative impact on the setting of this CA can be expected as a result of development at the Broad Location.

Score	SA5: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Scheduled Monument	A	A minor negative impact would be expected on the setting of two SMs which are located adjacent to the location: 'Fishpond complex, 260m east of Castle Farm'; and 'Kenilworth Castle: a motte and bailey and enclosure castle with mere, dams and 16th century gardens' <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.10.6 SA Objective 6: Pollution

Table B.10.6: The assessment of Broad Location at 'Kenilworth West' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	A minor negative impact on watercourse quality could be expected as Finham Brook is located approximately 160m to the north of the location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
-	Groundwater SPZ	M	A minor negative impact on groundwater quality could be expected as a proportion of the location coincides with Groundwater SPZ 3. <i>Mitigation: Appropriate management of construction and appropriate design measures to prevent pollution of the groundwater.</i>

B.10.7 SA Objective 7: Natural Resources

Table B.10.7: The assessment of Broad Location at 'Kenilworth West' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on Grade 3 land. Development on Grade 3 land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location wholly coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.10.8 SA Objective 8: Waste

Table B.10.8: The assessment of Broad Location at 'Kenilworth West' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.10.9 SA Objective 9: Housing

Table B.10.9: The assessment of Broad Location at 'Kenilworth West' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.10.10 SA Objective 10: Health

Table B.10.10: The assessment of Broad Location at 'Kenilworth West' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
+	NHS Hospital with A&E Department	-	The Broad Location is within the sustainable target distance to 'Warwick Hospital'. A minor positive impact on access to these healthcare services would be expected.
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	The Broad Location is not within or near to an AQMA.
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

B.10.11 SA Objective 11: Accessibility

Table B.10.11: The assessment of Broad Location at 'Kenilworth West' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.

Score	SA11: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
++	Railway Station	-	Majority of BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
-	Connectivity	M	A large proportion of the Broad Location lies within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores could be expected.

B.10.12 SA Objective 12: Education

Table B.10.12: The assessment of Broad Location at 'Kenilworth West' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the Broad Location is within the sustainable target distance of 'Clinton Primary School' and 'St John's Primary School'.
-	Access to Secondary School	M	A minor negative impact could be expected as this location is outside the sustainable target distance of any secondary schools. <i>Mitigation: Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.10.13 SA Objective 13: Economy

Table B.10.13: The assessment of Broad Location at 'Kenilworth West' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KENILWORTH WEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Kenilworth.

B.11 Royal Leamington Spa East

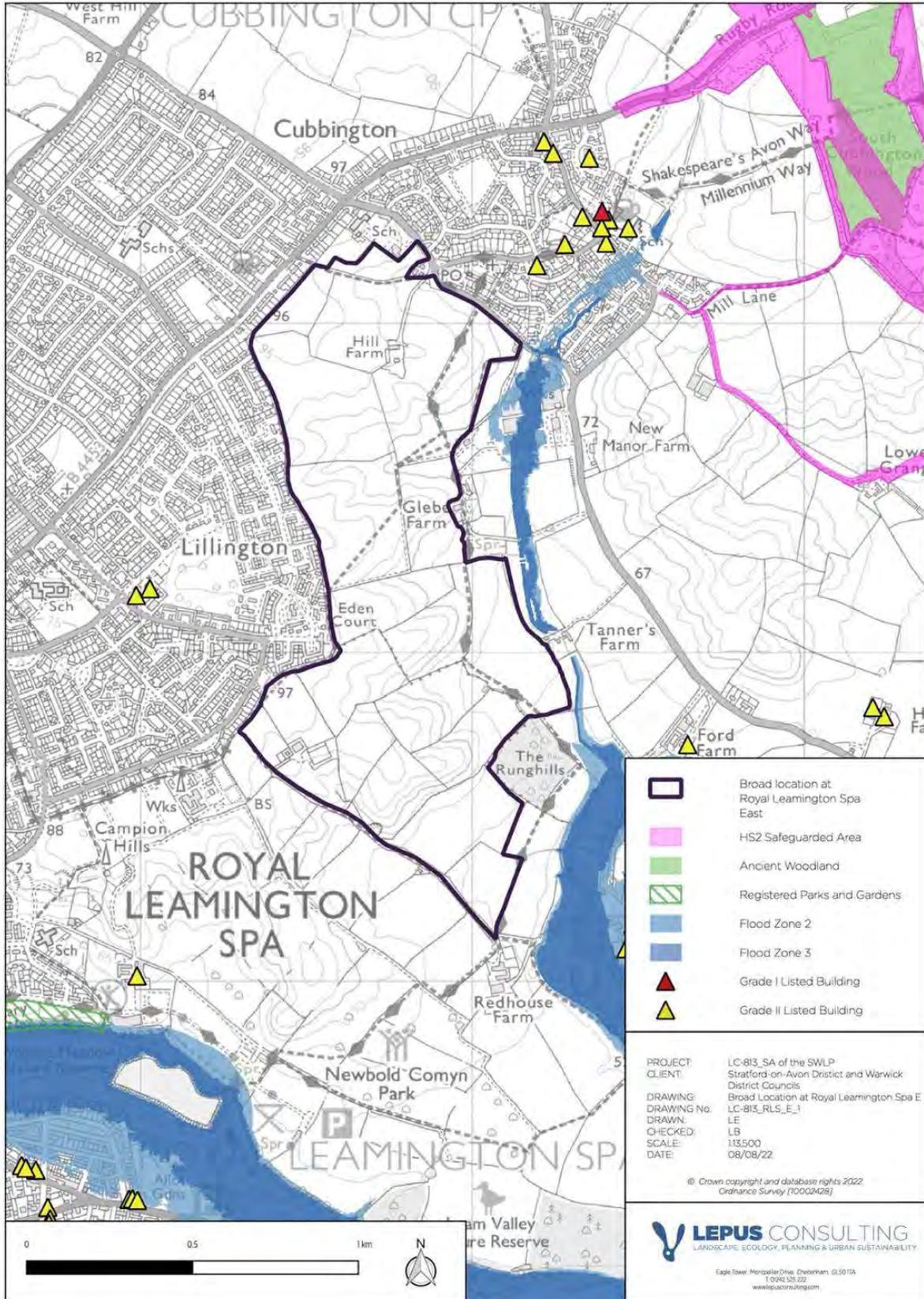


Figure B.11.1: Broad Location at 'Royal Leamington Spa East' with selected constraints

B.11.1 SA Objective 1: Climate Change

Table B.11.1: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.11.2 SA Objective 2: Flood Risk

Table B.11.2: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.11.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.11.3: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Enzor's Pool' SAC located approximately 21.9km north of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	Development proposal not anticipated to result in adverse impacts on an LNR.
-	LWSs	A	<p>Slightly coincides with 'The Runghills' LWS. Development could result in a minor negative impact on LWSs.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	Does not coincide with any LGSs.
0	Priority Habitats	-	Development proposal does not coincide with a priority habitat.

B.11.4 SA Objective 4: Landscape

Table B.11.4: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 4

(Landscape)

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 14.5km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Dunsmore Character Area. Local Character Area is the Plateau Fringe and could be enhanced. The Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
-	Country Parks	M	Located approximately 150m from 'Newbold Comyn' Country Park. A minor negative impact on the setting of this CP could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Views for PRoW Users	M	Coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.11.5 SA Objective 5: Cultural Heritage

Table B.11.5: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
-	Grade II* Listed Building	M	A minor negative impact on the setting of 'Offchurch Bury' could be expected. The Broad Location is approximately 440m from this Grade II* Listed Building. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Listed Building.</i>
-	Grade II Listed Building	M	Located within 390m to Grade II Listed Buildings 'Ford Farmhouse', 'Offchurch Bury, Dovecote Approximately 100m North' and 'Offchurch Bury, Stable Block Approximately 30 Metres Northwest'. A minor negative impact on the settings of these heritage assets could be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any RPG.
0	Conservation Area	-	Not located in proximity to any Conservation Area ² .

² Warwick District Council (2007) Royal Leamington Spa Conservation Area. Available at: https://www.warwickdc.gov.uk/downloads/file/3081/leamington_-_guide_to_conservation_areas [Date Accessed 23/09/22].

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.11.6 SA Objective 6: Pollution

Table B.11.6: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Located approximately 150m from the River Leam. A minor negative impact on this watercourse could be expected as a result of development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.11.7 SA Objective 7: Natural Resources

Table B.11.7: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 2 and 3 land, as well as a small proportion of 'urban' land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a location wholly coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.11.8 SA Objective 8: Waste

Table B.11.8: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.11.9 SA Objective 9: Housing

Table B.11.9: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.11.10 SA Objective 10: Health

Table B.11.10: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
-	NHS Hospital with A&E Department	M	The Broad Location is located outside of the target distance to an NHS hospital with an A&E department. A minor negative impact on access to healthcare would be expected. <i>Mitigation: Cannot wholly mitigate. Improving public transport services will indirectly benefit access to these services.</i>
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
+	Access to Leisure Facilities	-	A minor positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'The Greig Leisure Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network but there is currently no connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.11.11 SA Objective 11: Accessibility

Table B.11.11: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the Broad Location is located within the target distance to a bus stop providing regular services.
-	Railway Station	M	Located wholly outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
-	Connectivity	M	Located within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport and connectivity could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor negative impact on access to food stores would be expected.

B.11.12 SA Objective 12: Education

Table B.11.12: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to various primary schools including 'Cubbington C of E Primary School', 'Telford Infant School' and 'Telford Junior School'. A minor positive impact would be expected on access to educational facilities as a result of development at the Broad Location.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'North Leamington School'. A minor positive impact would be expected on access to educational facilities as a result of development at the Broad Location.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.11.13 SA Objective 13: Economy

Table B.11.13: The assessment of Broad Location at 'Royal Leamington Spa East' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA EAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.12 Royal Leamington Spa Northeast

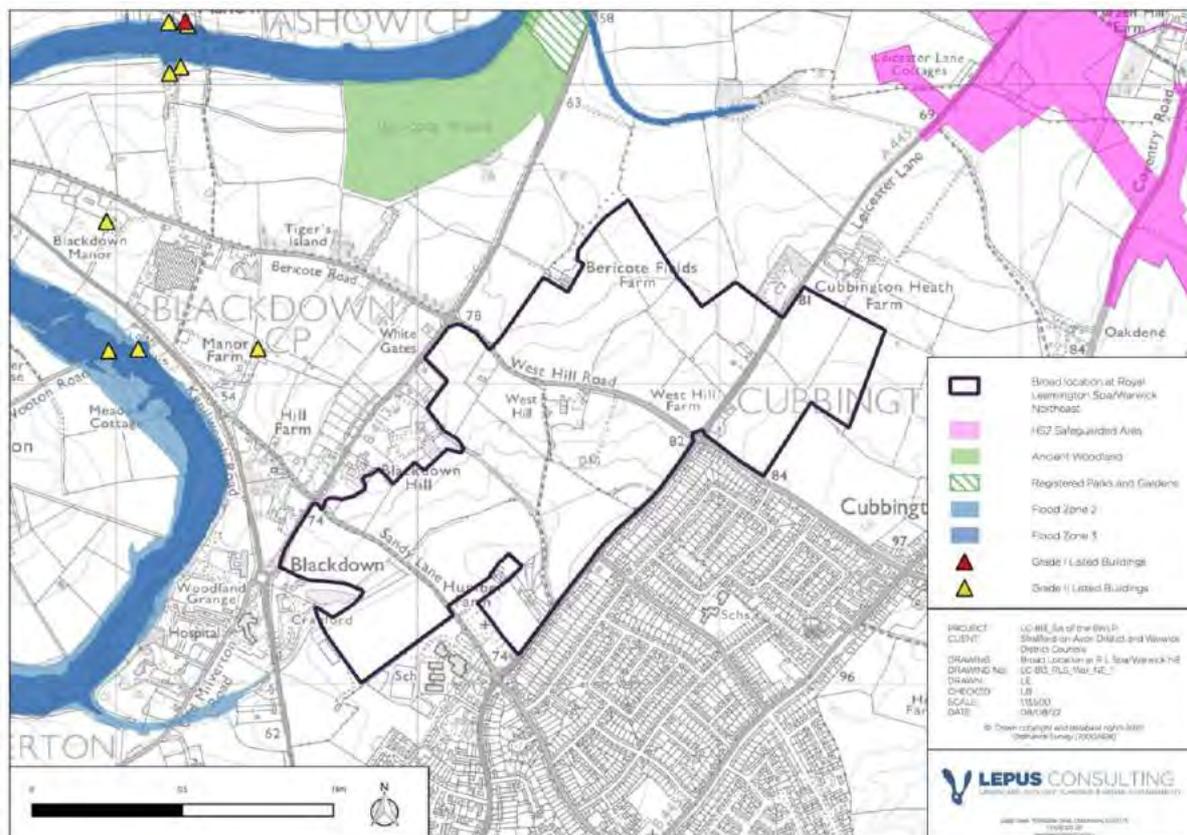


Figure B.12.1: Broad Location at 'Royal Leamington Spa Northeast' with selected constraints

B.12.1 SA Objective 1: Climate Change

Table B.12.1: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.12.2 SA Objective 2: Flood Risk

Table B.12.2: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.12.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.12.3: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 20km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	Located approximately 380m from 'Bericote Wood' ancient woodland to the north of the location. A neutral effect would be expected as the wood is some distance from the location and has no public access.
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	Partially coincides with 'River Avon and Tributaries' LWS. A minor negative impact is anticipated. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	Does not coincide with any LGSs.
0	Priority Habitats	-	Does not coincide with any priority habitat.

B.12.4 SA Objective 4: Landscape

Table B.12.4: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 20km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which has been identified as suitable for enhancement. The Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy</i>

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
			presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with a PRow footpath. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.12.5 SA Objective 5: Cultural Heritage

Table B.12.5: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
0	Grade II Listed Building	-	The Grade II Listed Building 'Barn to North of Blackdown Farmhouse' is located approximately 550m to the west of the Broad Location, with farmland and greenfield in between. Given the nature and character of this Grade II Listed Building, a negligible impact is expected as a result of development at the Broad Location.
-	Registered Parks and Gardens	M	Potential minor negative impact on the setting of 'Stoneleigh Abbey', which is located approximately 480m from the Broad Location and separated by intervening farmland, greenfield and woodland. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this RPG.</i>
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.12.6 SA Objective 6: Pollution

Table B.12.6: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A445 and is located within 200m of the A452. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>

Score	SA6: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
0	Railway Line	-	Not within 200m of a railway line.
0	Watercourses	-	The Broad Location is not located in close proximity to any watercourses.
-	Groundwater SPZ	M	Coincides with groundwater SPZ 3. A minor negative impact on local groundwater resources could be expected following development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the groundwater.</i>

B.12.7 SA Objective 7: Natural Resources

Table B.12.7: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 2 and 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the location wholly coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.12.8 SA Objective 8: Waste

Table B.12.8: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.12.9 SA Objective 9: Housing

Table B.12.9: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.12.10 SA Objective 10: Health

Table B.12.10: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
+	NHS Hospital with A&E Department	-	The Broad Location is located within the target distance to an NHS hospital with an A&E department. A minor positive impact on access to healthcare would be expected.
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
-	Access to Leisure Facilities	M	Located wholly outside of the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A445 and is located within 200m of the A452. A minor negative impact on health could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network. A minor positive impact on the health and wellbeing is expected.

B.12.11 SA Objective 11: Accessibility

Table B.12.11: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
-	Railway Station	M	Located wholly outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
	Connectivity	-	Data not available.
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.12.12 SA Objective 12: Education

Table B.12.12: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Telford Infant School', 'Telford Junior School' and 'Our Lady and St Teresa's Catholic Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is located within the target distance to 'North Leamington School' secondary school. A minor positive impact on access to secondary educational facilities is expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.12.13 SA Objective 13: Economy

Table B.12.13: The assessment of Broad Location at 'Royal Leamington Spa Northeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.13 Royal Leamington Spa Northwest

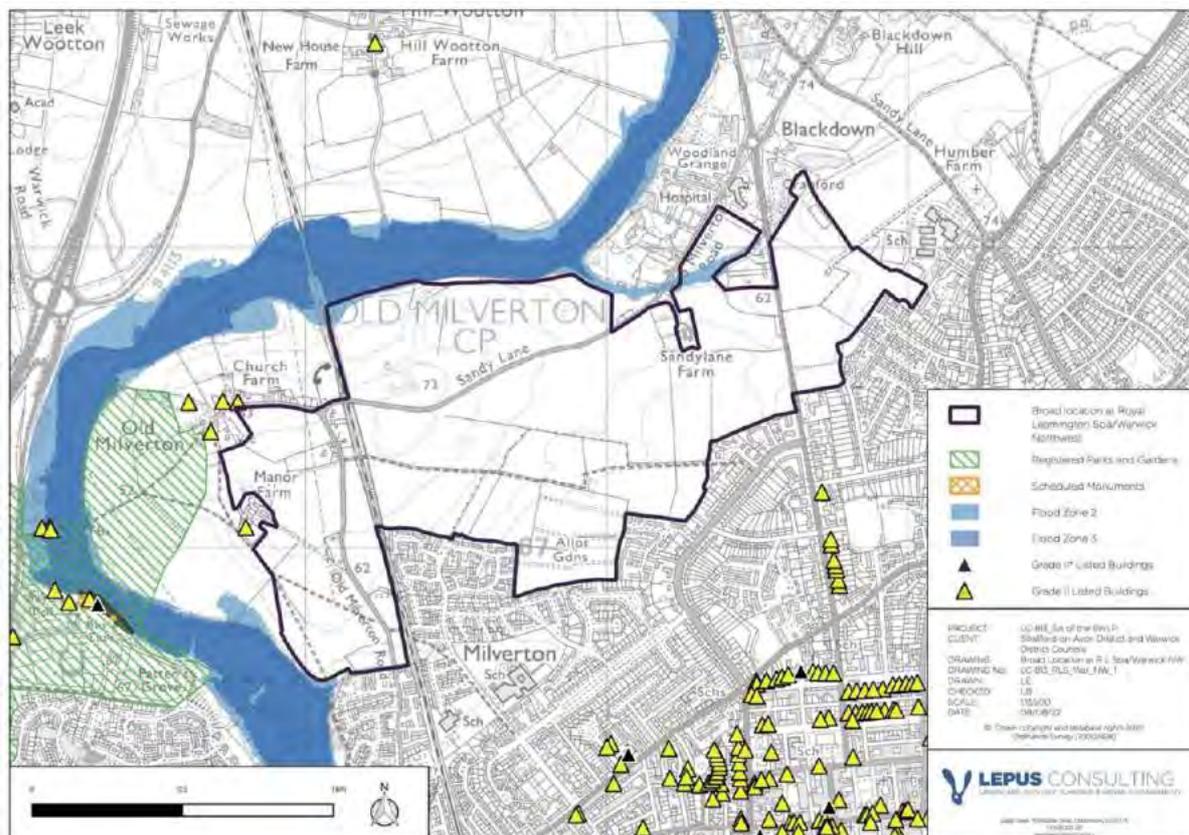


Figure B.13.1: Broad Location at 'Royal Leamington Spa Northwest' with selected constraints

B.13.1 SA Objective 1: Climate Change

Table B.13.1: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.13.2 SA Objective 2: Flood Risk

Table B.13.2: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.13.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.13.3: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 22.3km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	Partially coincides with 'River Avon and Tributaries' and 'Dropping Wells' LWSs. The development of this Broad Location could result in a minor negative impact on LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	LGS	A	Slightly coincides with 'Old Milverton River Terraces' LGS. A minor negative impact on this LGS could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Priority Habitats	A/M	Coincides with deciduous woodland priority habitat. A minor negative impact on biodiversity could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

B.13.4 SA Objective 4: Landscape

Table B.13.4: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 19.2km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. This BL is located in the Arden Parklands local character area which has been identified as suitable for enhancement. The

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
			Broad Location could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.13.5 SA Objective 5: Cultural Heritage

Table B.13.5: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	M	A minor negative impact on Grade II Listed Buildings 'Manor Farmhouse', 'Church of St James', 'Parkhouse Farmhouse', 'Cottage Farmhouse' and 'Barn 24 Yards to East of Cottage Farmhouse' could be expected. The location is within 155m of these heritage assets. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
-	Registered Parks and Gardens	M	A potential minor negative impact on the setting of 'Guy's Cliffe' RPG, located approximately 45m from the Broad Location, would be expected as the RPG and Broad Location is separated by greenfield only. <i>Mitigation: Landscape led design to conserve and enhance the setting of this RPG.</i>
-	Conservation Area	M	Located adjacent to 'Kenilworth Road' and 'Northumberland Road' CAs. A minor negative impact on the setting of these CAs would be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.13.6 SA Objective 6: Pollution

Table B.13.6: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A452 and is located within 200m of the A445. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	Coincides with a railway line to the west of the location. A minor negative impact on air and noise quality could be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality.</i>
-	Watercourses	M	Located adjacent to the River Avon. A minor negative impact on this watercourse could be expected following development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
-	Groundwater SPZ	M	Coincides with groundwater SPZ 3. A minor negative impact on local groundwater resources could be expected. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the groundwater.</i>

B.13.7 SA Objective 7: Natural Resources

Table B.13.7: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 2 and 3 land, with a small proportion located on urban land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.13.8 SA Objective 8: Waste

Table B.13.8: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 8

(Waste)

Score	SA8: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.13.9 SA Objective 9: Housing

Table B.13.9: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.13.10 SA Objective 10: Health

Table B.13.10: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
++	NHS Hospital with A&E Department	-	The Broad Location is entirely within the target distance to these healthcare services. A major positive impact on access to healthcare would be expected.
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	Located wholly outside of the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A452 and is located within 200m of the A445. A minor negative impact on health could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow network but connectivity to the cycle network only exists for a small proportion of the Broad Location. A minor positive impact on the health and wellbeing is expected.

B.13.11 SA Objective 11: Accessibility

Table B.13.11: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the Broad Location is located within the target distance to a bus stop providing regular services.
+	Railway Station	-	The Broad Location is within the sustainable target distance to a railway station. A minor positive impact on site end users' access to rail services is expected.
	Connectivity	-	Data not available.
-	Food stores	M	Wholly located outside of the sustainable target distance to food stores. A minor negative impact on access to food stores could be expected. <i>Mitigation: Potential for local services to be included within the site layout.</i>

B.13.12 SA Objective 12: Education

Table B.13.12: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Milverton Primary School' and 'Brookhurst Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is located within the target distance to 'Trinity Catholic School' and 'North Leamington School' secondary school. A minor positive impact on access to education is expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.13.13 SA Objective 13: Economy

Table B.13.13: The assessment of Broad Location at 'Royal Leamington Spa Northwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA NORTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.14 Royal Leamington Spa South

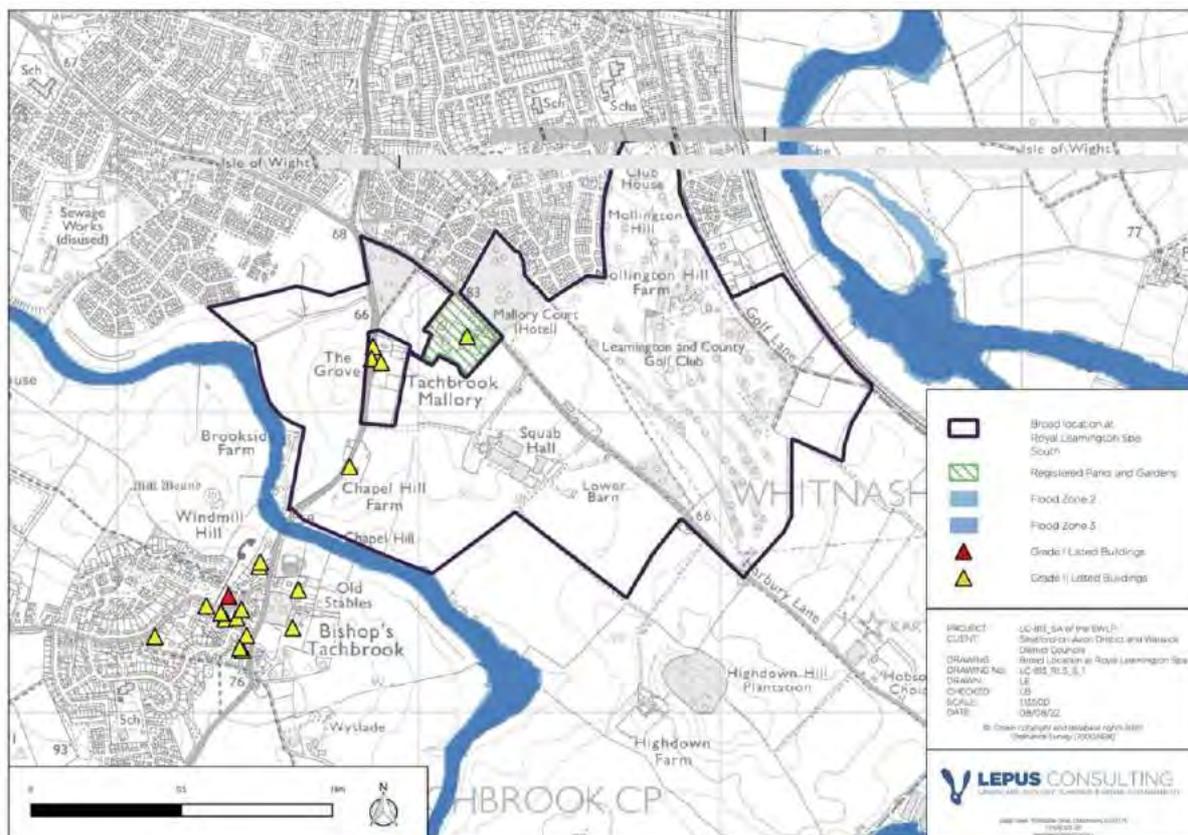


Figure B.14.1: Broad Location at 'Royal Leamington Spa South' with selected constraints

B.14.1 SA Objective 1: Climate Change

Table B.14.1: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.14.2 SA Objective 2: Flood Risk

Table B.14.2: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 2 (Flood)

Risk)

Score	SA2: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.14.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.14.3: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 27.4km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	Partially coincides with 'Mollington Hill' and 'Whitnash Meadow' LWSs. The development of this Broad Location could result in a minor negative impact on LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	Does not coincide with any LGSs.
-	Priority Habitats	A/M	Coincides with deciduous woodland and good quality semi-improved grassland priority habitats. A minor negative impact on biodiversity could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

B.14.4 SA Objective 4: Landscape

Table B.14.4: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
0	National Landscapes/AONBs	-	Located approximately 13.5km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. The Vale Farmlands local character area within which the BL sits could be enhanced. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy</i>

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
			presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRoW Users	M	Coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.14.5 SA Objective 5: Cultural Heritage

Table B.14.5: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
-	Grade I Listed Building	M	A minor negative impact on the setting of Grade I Listed Building 'The Church of St Chad' could be expected. The location is approximately 350m from this heritage asset. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Listed Building.</i>
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A/M	Coincides with 'Chapel Hill Farmhouse'. A major negative impact on this Grade II Listed Building could be expected. The Broad Location is also located within 205m of 'The Leopard Public House', 'Tachbrook Mallory House (Eastern 2/3) The Grove', 'The Barracks 14 Yards to West of the Grove/Tachbrook Mallory House', 'Wall, Gate Piers and Gates 50 Yards to North of the Barracks' and 'Mallory Court Hotel' with potential for negative impacts on the settings of these Grade II Listed Buildings. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
--	Registered Parks and Gardens	A	Potential major negative impact on the setting of 'Mallory Court' RPG, which is located adjacent to the Broad Location and would be wholly encapsulated by the development at the Broad Location. This would be likely to significantly alter the setting and character of this RPG. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Conservation Area	M	Located in close proximity to the 'Bishops Tachbrook' CA. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.14.6 SA Objective 6: Pollution

Table B.14.6: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 6

(Pollution)

Score	SA6: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
-	Railway Line	M	Located adjacent to a railway line. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality.</i>
-	Watercourses	M	Located approximately 20m from 'Tach Brook' minor watercourse. A minor negative impact on this watercourse could be expected. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.14.7 SA Objective 7: Natural Resources

Table B.14.7: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 2 and 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.14.8 SA Objective 8: Waste

Table B.14.8: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.14.9 SA Objective 9: Housing

Table B.14.9: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 9

(Housing)

Score	SA9: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.14.10 SA Objective 10: Health

Table B.14.10: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
+	NHS Hospital with A&E Department	-	The Broad Location is within the target distance to an NHS hospital with an A&E department. A minor positive impact on access to healthcare would be expected.
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
-	Access to Leisure Facilities	M	Located wholly outside of the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A minor positive impact on health is expected.
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow network. The majority of the site is not currently adequately connected to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.14.11 SA Objective 11: Accessibility

Table B.14.11: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
-	Railway Station	M	Located wholly outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
	Connectivity	-	Data not available.
-	Food stores	M	Wholly located outside of the sustainable target distance to food stores. A minor negative impact on access to food stores could be expected. <i>Mitigation: Potential for local services to be included within the site layout.</i>

B.14.12 SA Objective 12: Education

Table B.14.12: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 12

(Education)

Score	SA12: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
+	Access to Primary School	-	The Broad Locations is within the sustainable target distance to 'Briar Hill Infant School', 'St Margaret's C of E Junior School' and 'St Joseph's Catholic Primary School'. A minor positive impact on access to primary educational facilities would be expected.
-	Access to Secondary School	M	Large proportion of location located outside of the target distance to a secondary school. A minor negative impact on access to education could be expected. <i>Mitigation: Improvements to public transport may provide enhanced access to these facilities. Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.14.13 SA Objective 13: Economy

Table B.14.13: The assessment of Broad Location at 'Royal Leamington Spa South' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTH: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.15 Royal Leamington Spa Southeast

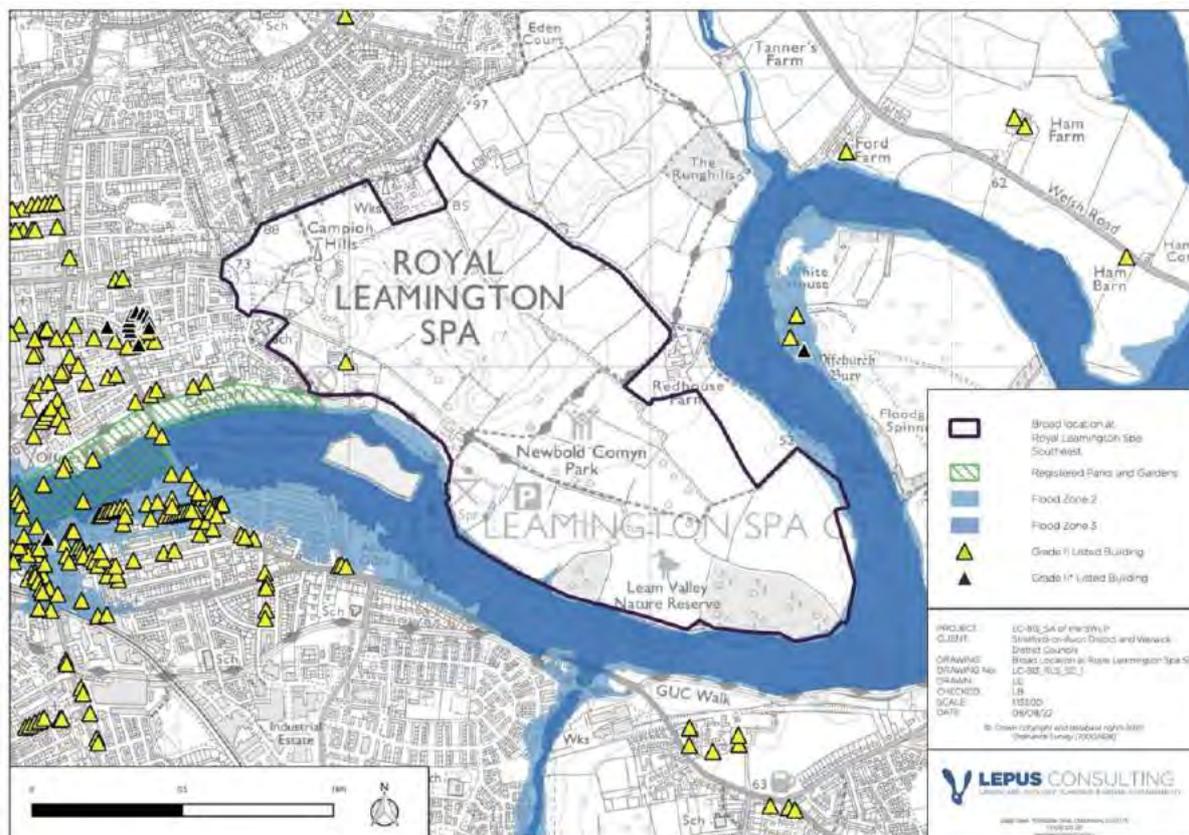


Figure B.15.1: Broad Location at 'Royal Leamington Spa Southeast' with selected constraints

B.15.1 SA Objective 1: Climate Change

Table B.15.1: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
---	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.15.2 SA Objective 2: Flood Risk

Table B.15.2: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.15.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.15.3: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 23.6km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
--	LNRs	A	Coincides with 'Leam Valley' LNR; development of this Broad Location could result in a major negative impact on Leam Valley. BL is also located approximately 100m and 300m from 'Welches Meadow' and 'Whitnash Brook' LNRs respectively. <i>Mitigation: Mitigation: Avoid impacts on Leam Valley LNR through the location and layout of future proposals.</i>
-	LWSs	A	Coincides with 'Newbold Comyn' LWS. The development of this Broad Location could result in a minor negative impact on LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	Does not coincide with any LGSs.
-	Priority Habitats	A/M	Coincides with deciduous woodland and coastal and floodplain grazing marsh priority habitats. A minor negative impact on biodiversity could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

B.15.4 SA Objective 4: Landscape

Table B.15.4: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 16.4km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
-	Landscape Character	M	Located within Dunsmore Character Area. Local Character Area is the Plateau Fringe and could be enhanced. The Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
--	Country Parks	A	Coincides with 'Newbold Comyn' CP. A major negative impact on this CP could be expected upon development at this Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.15.5 SA Objective 5: Cultural Heritage

Table B.15.5: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
-	Grade II* Listed Building	M	A minor negative impact on the setting of 'Offbury Church' could be expected. The Broad Location is approximately 380m from this Grade II* Listed Building. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Listed Building.</i>
--	Grade II Listed Building	A/M	Coincides with Grade II Listed Building 'Newbold Comyn Arms Public House'. A major negative impact on this Grade II Listed Building would be expected. Broad Location also located within 400m of 'Offchurch Bury, Stable Block Approximately 30 Metres Northwest', 'Offchurch Bury, Dovecote Approximately 100 Metres North', 'Ford Farmhouse', 'Radford Hall' and 'Parish Church of St Nicholas' with potential for minor negative impacts on the settings of these Grade II Listed Buildings. <i>Mitigation: Avoid impacts through the location and layout of future proposals (Newbold Comyn Arms Public House). Landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
-	Registered Parks and Gardens	M	Located adjacent to 'Spa Gardens, Royal Leamington Spa' RPG. A minor negative impact on the setting of this RPG would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this RPG.</i>
-	Conservation Area	M	Located adjacent to 'Royal Leamington Spa' CA, namely 'Warwick New Road'. A minor negative impact on the

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
			setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.15.6 SA Objective 6: Pollution

Table B.15.6: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Located approximately 190m from the A425 main road. As a result, a minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Located approximately 40m from the River Leam. A minor negative impact on this watercourse could be expected as a result of development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.15.7 SA Objective 7: Natural Resources

Table B.15.7: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 2 and 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a location wholly coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.15.8 SA Objective 8: Waste

Table B.15.8: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 8

(Waste)

Score	SA8: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.15.9 SA Objective 9: Housing

Table B.15.9: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.15.10 SA Objective 10: Health

Table B.15.10: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
+	NHS Hospital with A&E Department	-	The Broad Location is within the target distance to an NHS hospital with an A&E department. A minor positive impact on access to healthcare would be expected.
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
++	Access to Leisure Facilities	-	Located entirely within the target distance to the leisure facility 'Newbold Comyn Leisure Centre'. A major positive impact on access to these facilities is expected.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW and cycle networks. A minor positive impact on the health and wellbeing is expected.

B.15.11 SA Objective 11: Accessibility

Table B.15.11: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
+	Railway Station	-	The Broad Location is within the sustainable target distance to a railway station. A minor positive impact on site end users' access to rail services is expected.
	Connectivity	-	Data not available.
+	Food stores	-	The Broad Location is situated within the sustainable target distance to a food store. A minor negative impact on access to food stores could be expected.

B.15.12 SA Objective 12: Education

Table B.15.12: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Radford Semele C of E Primary School', 'St Anthony's Catholic Primary School' and 'St Paul's C of E Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Campion School'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.15.13 SA Objective 13: Economy

Table B.15.13: The assessment of Broad Location at 'Royal Leamington Spa Southeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.16 Royal Leamington Spa Southwest

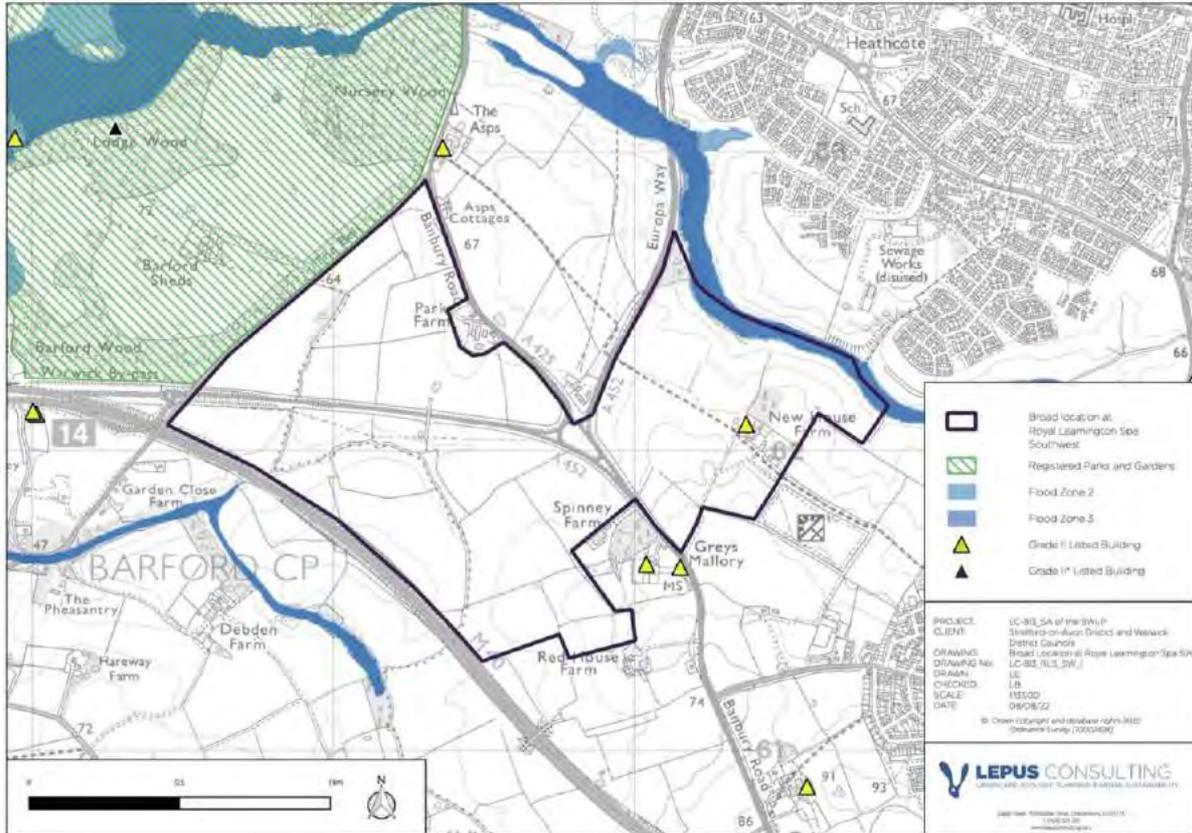


Figure B.16.1: Broad Location at 'Royal Leamington Spa Southwest' with selected constraints

B.16.1 SA Objective 1: Climate Change

Table B.16.1: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.16.2 SA Objective 2: Flood Risk

Table B.16.2: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.16.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.16.3: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 23.6km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	Coincides with 'Greys Mallory LWS' and 'the River Avon and Tributaries LWS'. The development of this Broad Location could result in a minor negative impact on LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	Does not coincide with any LGSs.
-	Priority Habitats	A/M	Coincides with deciduous woodland. A minor negative impact on biodiversity could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

B.16.4 SA Objective 4: Landscape

Table B.16.4: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 16.4km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. The Vale Farmlands local character area within which the BL sits could be enhanced. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise.

Score	SA4: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
			<i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not in proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.16.5 SA Objective 5: Cultural Heritage

Table B.16.5: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A/M	Coincides with Grade II Listed Building 'Barn approximately 30m northwest of Newhouse Farmhouse'. A major negative impact on the setting of this Grade II Listed Building would be expected as a result of development at the Broad Location. The Broad Location is also within close proximity to Grade II Listed Buildings 'Greys Mallory including forecourt walls to east and southeast', 'West Lodge, East Lodge and Archway 106 yards to east of Greys Mallory' and 'The Aspens'. A minor negative impact would be expected on the settings of these Grade II Listed Buildings. <i>Mitigation: Avoid impacts through the location and layout of future proposals (Barn approximately 30m northwest of Newhouse Farmhouse). Landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
-	Registered Parks and Gardens	M	Potential minor negative impact on the setting of 'Warwick Castle' RPG, which is located adjacent to the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this RPG.</i>
-	Conservation Area	M	Located adjacent to 'Warwick' CA. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.16.6 SA Objective 6: Pollution

Table B.16.6: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	The Broad Location is adjacent to the A425 in the north and the M40 in the southwest. A minor negative impact on air and noise pollution could be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Located adjacent to 'Tach Brook'. A minor negative impact on this watercourse could be expected following development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.16.7 SA Objective 7: Natural Resources

Table B.16.7: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 2 and 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a location wholly coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.16.8 SA Objective 8: Waste

Table B.16.8: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.16.9 SA Objective 9: Housing

Table B.16.9: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.16.10 SA Objective 10: Health

Table B.16.10: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
++	NHS Hospital with A&E Department	-	The Broad Location is situated entirely within the target distance to these healthcare services. A major positive impact on access to these healthcare facilities would be expected.
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	Located outside of the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A minor positive impact on health is expected.
-	Main Road	A/M	The Broad location coincides with the A452 and is adjacent to the M40. A minor negative impact on health would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
+	Access to Greenspace	-	Located partially within of the target distance to one or more greenspaces. A minor positive effect on health would be expected.
+	Access to PRow / Cycle Path	-	The majority of the Broad Location is situated within the target distance to the PRow network, with only a small proportion currently linked to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.16.11 SA Objective 11: Accessibility

Table B.16.11: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
-	Bus Stop	M	None of the Broad Location is within the target distance to regular bus services. A minor negative impact on site end users' access to sustainable transport could be expected. <i>Mitigation: Public transport improvement schemes and active travel measures.</i>

Score	SA11: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
-	Railway Station	M	Large proportion located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
	Connectivity	-	Data not available.
-	Food stores	M	Wholly located outside of the sustainable target distance to food stores. A minor negative impact on access to food stores could be expected. <i>Mitigation: Potential for local services to be included within the site layout.</i>

B.16.12 SA Objective 12: Education

Table B.16.12: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Heathcote Primary School'. A minor positive impact on access to primary educational facilities would be expected.
-	Access to Secondary School	M	Large proportion of location located outside of the target distance to a secondary school. A minor negative impact on access to education could be expected. <i>Mitigation: Improvements to public transport may provide enhanced access to these facilities. Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

B.16.13 SA Objective 13: Economy

Table B.16.13: The assessment of Broad Location at 'Royal Leamington Spa Southwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	ROYAL LEAMINGTON SPA SOUTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.17 Shipston-on-Stour East

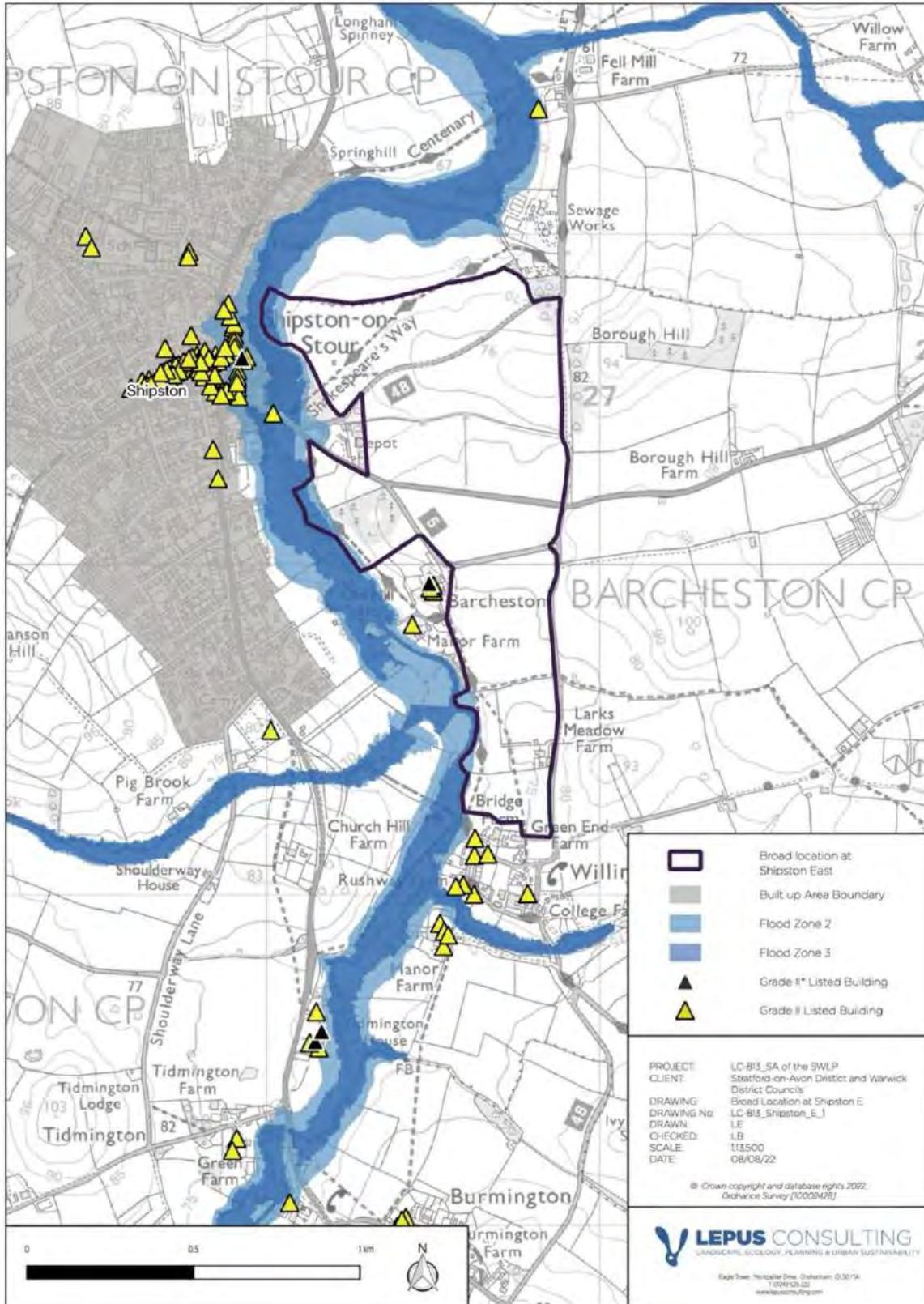


Figure B.17.1: Broad Location at 'Shipston East' with selected constraints

B.17.1 SA Objective 1: Climate Change

Table B.17.1: The assessment of Broad Location at ‘Shipston East’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver approximately 1,700 or more dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.17.2 SA Objective 2: Flood Risk

Table B.17.2: The assessment of Broad Location at ‘Shipston East’ against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.17.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.17.3: The assessment of Broad Location at ‘Shipston East’ against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is ‘Bredon Hill’ SAC located approximately 28km northwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	<p>A minor negative impact on ‘Bridge Farm Permanent Pasture’ and ‘River Stour’ LWSs could be expected as they coincide with the Broad Location.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	The Broad Location does not coincide with any LGSs.
0	Priority Habitats	-	The Broad Location does not coincide with any priority habitat.

B.17.4 SA Objective 4: Landscape

Table B.17.4: The assessment of Broad Location at 'Shipston East' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
-	National Landscapes/AONBs	M	A minor negative impact on the setting of Cotswolds NL could be expected as the Broad Location is located 1.6km to the west and 3km to the north of the NL, separated by open space. <i>Mitigation: Mitigate impacts through the layout and design of GI and development.</i>
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. The Vale Farmlands local character area within which the BL sits could be enhanced. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies Document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. The western part of the BL includes an Area of Restraint landscape designation which would need to be avoided and designed into GI proposals. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development on this Broad Location could increase the risk of coalescence with Willington village. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

B.17.5 SA Objective 5: Cultural Heritage

Table B.17.5: The assessment of Broad Location at 'Shipston East' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
-	Grade II* Listed Building	M	A minor negative impact would be expected on the setting of two Grade II* Listed Buildings: 'Church of St Martin' and 'Church of St Edmund', which are located less than 100m from the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Grade II Listed Building	A/M	There is potential for a minor negative impact on the setting of various Grade II Listed Buildings located near the location, including: 'The Cottage'; 'Church of St Martin, Base of medieval cross approximately 15 metres to south of Nave'; and

Score	SA5: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
			'The Manor' <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	A/M	Coincides with 'Shipston' CA. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.17.6 SA Objective 6: Pollution

Table B.17.6: The assessment of Broad Location at 'Shipston East' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on air and noise pollution could be expected as the A3400 is located approximately 90m from the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	A minor negative impact on watercourse quality could be expected as the river Stour runs along the western boundary of the location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.17.7 SA Objective 7: Natural Resources

Table B.17.7: The assessment of Broad Location at 'Shipston East' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
--	ALC Grade	M/X	The Broad Location is located wholly on Grade 2 and Grade 3 land. Development on Grade 2 or Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the Broad Location coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.17.8 SA Objective 8: Waste

Table B.17.8: The assessment of Broad Location at 'Shipston East' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 1,700 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.17.9 SA Objective 9: Housing

Table B.17.9: The assessment of Broad Location at 'Shipston East' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 1,700 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.17.10 SA Objective 10: Health

Table B.17.10: The assessment of Broad Location at 'Shipston East' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Horton General Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
+	Access to Leisure Facilities	-	A minor positive impact on health could be expected as the Broad Location is within the sustainable target distance to 'Shipston Leisure Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on health could be expected as traffic on the A3400 which is located approximately 90m from the location would be likely to expose some location end users to air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network, with no current connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.17.11 SA Objective 11: Accessibility

Table B.17.11: The assessment of Broad Location at 'Shipston East' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
+	Bus Stop	-	A minor positive impact would be expected as the Broad Location is partially located within the target distance to a bus stop providing regular services.
-	Railway Station	M	Wholly located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
0	Connectivity	-	Unlikely to have an impact on transport as the majority of the Broad Location lies within an area identified as having moderate connectivity to the existing settlement (Grade C).
+	Food stores	-	The Broad Location is within the sustainable target distance to these facilities. A minor positive impact on access to food stores would be expected.

B.17.12 SA Objective 12: Education

Table B.17.12: The assessment of Broad Location at 'Shipston East' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Shipston-on-Stour Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Shipston High School'. A minor positive impact on access to secondary educational facilities would be expected.
-	Access to Further Education	M	A minor negative impact can be expected as the location is outside of the sustainable target distance of any post-16 (further) Schools. <i>Mitigation: Potential for post-16 (further) education provisions within the Broad Location layout.</i>

B.17.13 SA Objective 13: Economy

Table B.17.13: The assessment of Broad Location at 'Shipston East' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SHIPSTON EAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 1,700 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Shipston.

B.18 Shipston-on-Stour North

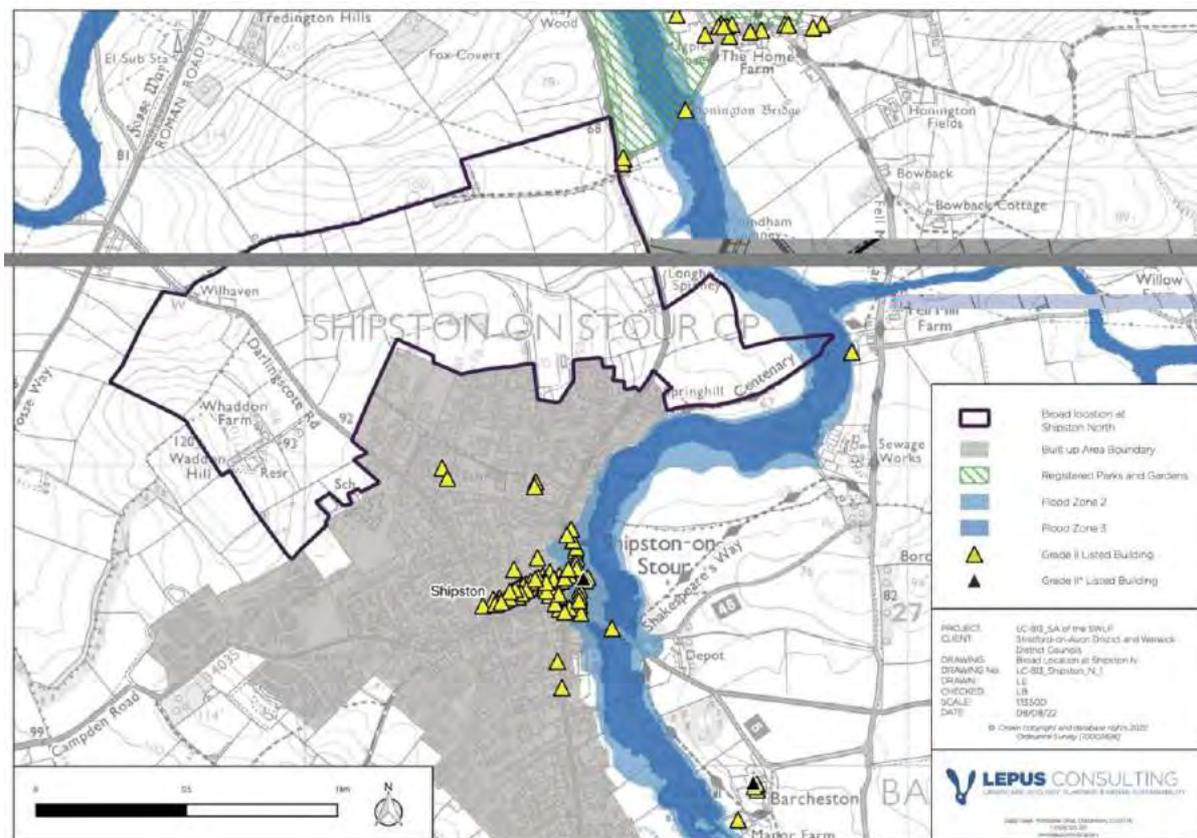


Figure B.18.1: Broad Location at ‘Shipston North’ with selected constraints

B.18.1 SA Objective 1: Climate Change

Table B.18.1: The assessment of Broad Location at ‘Shipston North’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
---	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.18.2 SA Objective 2: Flood Risk

Table B.18.2: The assessment of Broad Location at 'Shipston North' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.18.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.18.3: The assessment of Broad Location at 'Shipston North' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 28km west of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
-	SSSIs	A	A minor negative impact could be expected as the location coincides with an SSSI IRZ which relates to Midsummer Meadow SSSI. The IRZ requires consultation for residential developments of 100 units or more. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact on 'Shipston High School Sheep Field' LWS due to coincidence and the 'River Stour' LWS which is adjacent to the BL. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincides with 'Traditional Orchard'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.18.4 SA Objective 4: Landscape

Table B.18.4: The assessment of Broad Location at 'Shipston North' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
-	National Landscapes/AONBs	M	A minor negative impact on the setting of Cotswolds NL could be expected as the Broad Location is located approximately 2.5km to the northwest of the NL, separated by open space. <i>Mitigation: Mitigate impacts through the layout and design of GI and development.</i>

Score	SA4: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. The Vale Farmlands local character area within which the BL sits could be enhanced. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high/medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with a PRow footpath. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements as it is separated from Honington by a main road and the river Stour.

B.18.5 SA Objective 5: Cultural Heritage

Table B.18.5: The assessment of Broad Location at 'Shipston North' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
-	Grade I Listed Building	A	There is potential for a minor negative impact on the setting of Grade I Listed Buildings located approximately 520m from the Broad Location, including: 'Church of All Saints'; and 'Honington Hall and Attached Gateways, Walls and Temple' <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Grade II* Listed Building	-	Grade II* Listed Building 'Church of St Edmund' is located approximately 600m from the Broad Location. Due to intervening existing built form between the Broad Location and 'Church of St Edmund', a negligible impact on the setting of this Grade II* Listed Building would be expected as a result of development at the Broad Location.
-	Grade II Listed Building	A/M	There is potential for a minor negative impact on the setting of various Grade II Listed Building located adjacent or near to the Broad Location such as: 'Old Tollbar Cottage'; 'Fell Mill Farmhouse'; and 'Honington Bridge' <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Registered Parks and Gardens	A/M	A minor negative impact on 'Honington Hall' RPG can be expected as it is located adjacent to the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>
-	Conservation Area	A/M	Located adjacent to 'Honington' CA and approximately 250m from 'Shipston' CA. A minor negative impact on the

Score	SA5: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
			setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.18.6 SA Objective 6: Pollution

Table B.18.6: The assessment of Broad Location at 'Shipston North' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on air and noise pollution could be expected as the A3400 coincides with the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	A minor negative impact on watercourse quality could be expected as the River Stour runs adjacent to the west of the Broad Location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.18.7 SA Objective 7: Natural Resources

Table B.18.7: The assessment of Broad Location at 'Shipston North' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on Grade 2 and Grade 3 land. Development on Grade 2 or Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the Broad Location coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.18.8 SA Objective 8: Waste

Table B.18.8: The assessment of Broad Location at 'Shipston North' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.18.9 SA Objective 9: Housing

Table B.18.9: The assessment of Broad Location at 'Shipston North' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 1,700 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.18.10 SA Objective 10: Health

Table B.18.10: The assessment of Broad Location at 'Shipston North' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Horton General Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
++	Access to GP Surgery	-	The majority of this Broad Location is within the target distance to a GP Surgery. A major positive impact on access to GP surgeries would be expected following the development of the Broad Location.
++	Access to Leisure Facilities	-	A major positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'Shipston Leisure Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on could be expected as the A3400 coincides with the location and development would be likely to expose some site end users to air and noise pollution from traffic. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network, with no current connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.18.11 SA Objective 11: Accessibility

Table B.18.11: The assessment of Broad Location at 'Shipston North' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
-	Railway Station	M	Wholly located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
0	Connectivity	-	Unlikely to have an impact on transport as a large proportion of the Broad Location lies within an area identified as having moderate connectivity to the existing settlement (Grade C).
+	Food stores	-	The Broad Location is within the sustainable target distance to these facilities. A minor positive impact on access to food stores could be expected.

B.18.12 SA Objective 12: Education

Table B.18.12: The assessment of Broad Location at 'Shipston North' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Shipston-on-Stour Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Shipston High School'. A minor positive impact on access to secondary educational facilities would be expected.
-	Access to Further Education	M	A minor negative impact can be expected as the location is outside of the sustainable target distance of any post-16 (further) Schools. <i>Mitigation: Potential for post-16 (further) education provisions within the Broad Location layout.</i>

B.18.13 SA Objective 13: Economy

Table B.18.13: The assessment of Broad Location at 'Shipston North' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SHIPSTON NORTH: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Shipston.

B.19 Shipston-on-Stour Southwest

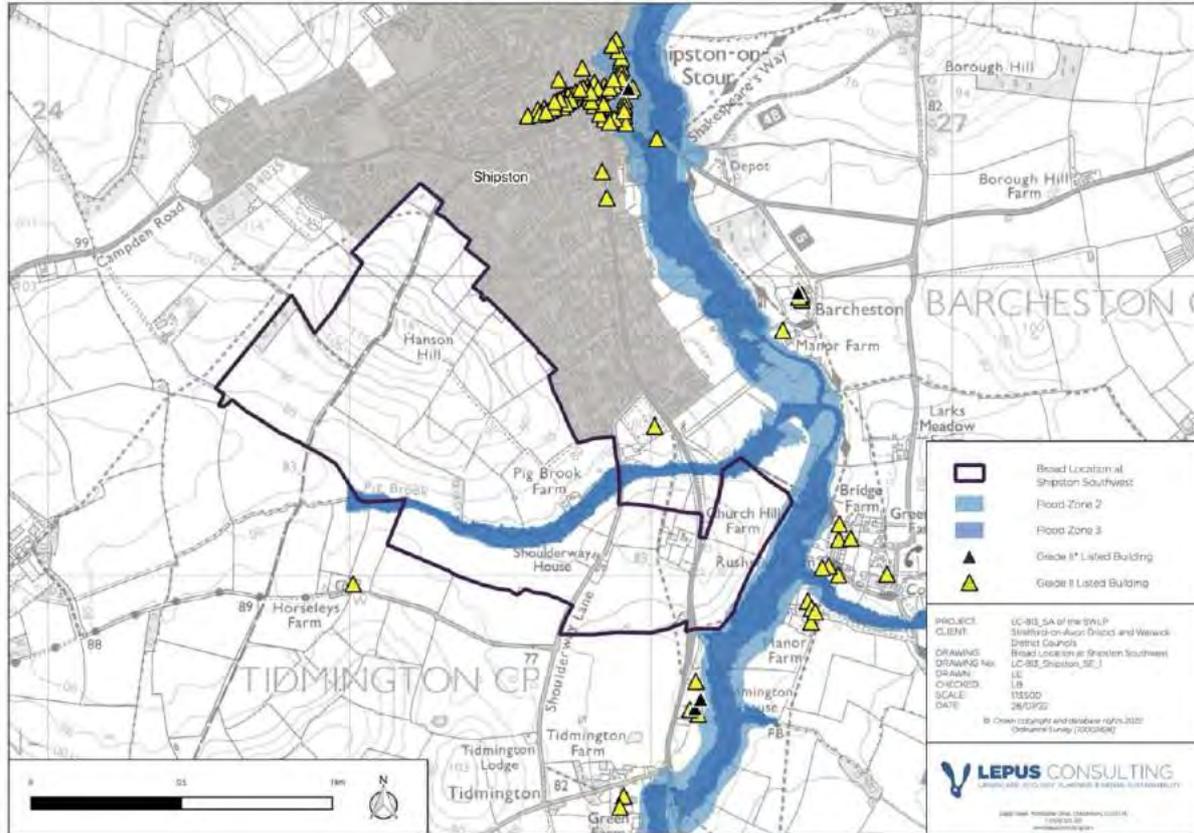


Figure B.19.1: Broad Location at ‘Shipston Southwest’ with selected constraints

B.19.1 SA Objective 1: Climate Change

Table B.19.1: The assessment of Broad Location at ‘Shipston Southwest’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.19.2 SA Objective 2: Flood Risk

Table B.19.2: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.19.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.19.3: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 26km northwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact on 'Furze Hill Fields' and 'Former A34 Layby' LWSs could be expected as the LWSs coincide with the Broad Location. The Broad Location in close proximity to the 'River Stour' LWS. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincides with 'traditional orchard' and 'coastal and floodplain grazing marsh'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.19.4 SA Objective 4: Landscape

Table B.19.4: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
-	National Landscapes/AONBs	M	A minor negative impact on the setting of Cotswolds NL could be expected as the Broad Location is located approximately 2km to the northwest of the NL, separated by open space. <i>Mitigation: Mitigate impacts through the layout and design of GI and development</i>
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. The Vale Farmlands local character area also includes large country houses set in parkland. Broad

Score	SA4: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
			Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	A/M	Includes areas of 'medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRoW Users	M	Coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.19.5 SA Objective 5: Cultural Heritage

Table B.19.5: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
-	Grade II* Listed Building	M	The Broad Location is located approximately 250m from Grade II* Listed Buildings 'Tidmington House' and 'Church of Unknown Dedication' and approximately 550m from 'Church of St Martin'. Minor negative impacts on the setting of these Grade II* Listed Buildings would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Grade II Listed Building	M	There is potential for a minor negative impact on the setting of various Grade II Listed Building located near to the Broad Location such as: 'Horsleys Farmhouse'; 'Cobwebs'; and 'The Cottage' <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	The Broad Location is located approximately 300m from 'Shipston' CA. Due to intervening built form, a negligible impact would be expected on the setting of this CA as a result of development at the Broad Location.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.19.6 SA Objective 6: Pollution

Table B.19.6: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on air and noise pollution could be expected as the A3400 coincides with the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	A minor negative impact on watercourse quality could be expected as the River Stour runs adjacent to the southeast boundary of the Broad Location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.19.7 SA Objective 7: Natural Resources

Table B.19.7: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on Grade 3 land. Development on Grade 3 land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a proportion of the Broad Location coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.19.8 SA Objective 8: Waste

Table B.19.8: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.19.9 SA Objective 9: Housing

Table B.19.9: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.19.10 SA Objective 10: Health

Table B.19.10: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Horton General Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
+	Access to Leisure Facilities	-	A minor positive impact on health could be expected as the Broad Location is within the sustainable target distance to 'Shipston Leisure Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on could be expected as the A3400 coincides with the location and development would be likely to expose some site end users to air and noise pollution from traffic. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network, with no current connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.19.11 SA Objective 11: Accessibility

Table B.19.11: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.

Score	SA11: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
-	Railway Station	M	Wholly located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
0	Connectivity	-	Unlikely to have an impact on transport as a large proportion of the Broad Location lies within an area identified as having moderate connectivity to the existing settlement (Grade C).
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.19.12 SA Objective 12: Education

Table B.19.12: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Shipston-on-Stour Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Shipston High School'. A minor positive impact on access to secondary educational facilities would be expected.
-	Access to Further Education	M	A minor negative impact can be expected as the location is outside the sustainable target distance of any post-16 (further) Schools. <i>Mitigation: Potential for post-16 (further) education provisions within the Broad Location layout.</i>

B.19.13 SA Objective 13: Economy

Table B.19.13: The assessment of Broad Location at 'Shipston Southwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SHIPSTON SOUTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including an industrial area in north Shipston.

B.20 Shipston-on-Stour West

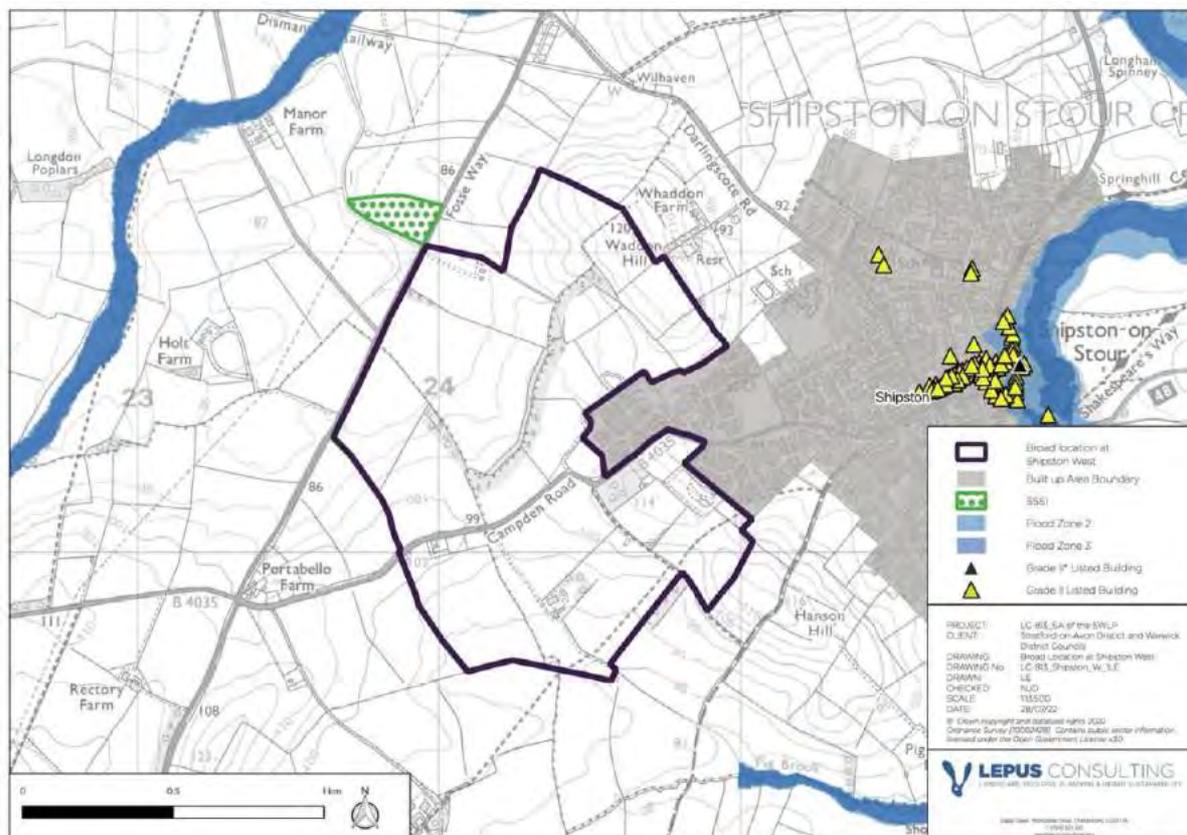


Figure B.20.1: Broad Location at ‘Shipston West’ with selected constraints

B.20.1 SA Objective 1: Climate Change

Table B.20.1: The assessment of Broad Location at ‘Shipston West’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.20.2 SA Objective 2: Flood Risk

Table B.20.2: The assessment of Broad Location at 'Shipston West' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
+	Riparian Flood Zones	-	This Broad Location wholly lies within Flood Zone 1.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.20.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.20.3: The assessment of Broad Location at 'Shipston West' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 25km west of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
-	SSSIs	A	A minor negative impact could be expected as the location is in close proximity to 'Midsummer Meadow' SSSI. BL is also coincident with an SSSI IRZ which requires consultation for all planning applications except householder applications. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact on 'Mount Pleasant Orchard' LWS could be expected as the BL coincides with it. The Broad Location is also adjacent to 'Shipston School Sheep Field' and 'Stretton-on-Fosse Road Verge'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'traditional orchard'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.20.4 SA Objective 4: Landscape

Table B.20.4: The assessment of Broad Location at 'Shipston West' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
-	National Landscapes/AONBs	M	A minor negative impact on the setting of Cotswolds NL could be expected as the Broad Location is located approximately 3.5km to the northwest of the NL, separated by open space. <i>Mitigation: Mitigate impacts through the layout and design of GI and development</i>

Score	SA4: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. The Vale Farmlands local character area within which the BL sits could be enhanced. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	A/M	Includes areas of 'medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.20.5 SA Objective 5: Cultural Heritage

Table B.20.5: The assessment of Broad Location at 'Shipston West' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
0	Grade II Listed Building	-	Not located in proximity to any Grade II Listed Buildings.
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.20.6 SA Objective 6: Pollution

Table B.20.6: The assessment of Broad Location at 'Shipston West' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on air and noise pollution could be expected as the A429 is adjacent to the west of Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of</i>

Score	SA6: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
			<i>green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
0	Watercourses	-	There are no watercourses in proximity of the location.
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.20.7 SA Objective 7: Natural Resources

Table B.20.7: The assessment of Broad Location at 'Shipston West' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
--	ALC Grade	M/X	The Broad Location is located almost wholly on ALC Grade 3 land. Development on Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
0	Mineral Safeguarding Areas	-	Does not coincide with an MSA.

B.20.8 SA Objective 8: Waste

Table B.20.8: The assessment of Broad Location at 'Shipston West' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.20.9 SA Objective 9: Housing

Table B.20.9: The assessment of Broad Location at 'Shipston West' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.20.10 SA Objective 10: Health

Table B.20.10: The assessment of Broad Location at 'Shipston West' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Horton General Hospital'.

Score	SA10: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
			<i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
++	Access to Leisure Facilities	-	A major positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'Shipston Leisure Centre' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on could be expected as the A429 is located adjacent to the western boundary of the location and traffic on the A429 would be likely to expose some end users to air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
+	Access to Greenspace	-	Located partially within of the target distance to one or more greenspaces. A minor positive effect on health would be expected. <i>Mitigation: negative impacts can be mitigated by the provision of greenspace within the layout and design of the Broad Location.</i>
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network, with no current connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.20.11 SA Objective 11: Accessibility

Table B.20.11: The assessment of Broad Location at 'Shipston West' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
-	Railway Station	M	Wholly located outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
-	Connectivity	M	A large proportion of the Broad Location lies within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
-	Food stores	M	Located wholly outside of the sustainable target distance to these facilities. A minor negative impact on access to food stores could be expected. <i>Mitigation: Potential for food stores to be included within the site layout.</i>

B.20.12 SA Objective 12: Education

Table B.20.12: The assessment of Broad Location at 'Shipston West' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Shipston-on-Stour Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	A minor positive impact could be expected as the Broad Location is within the sustainable target distance from secondary school 'Shipston High School'.
-	Access to Further Education	M	A minor negative impact can be expected as the location is outside the sustainable target distance of any post-16 (further) Schools. <i>Mitigation: Potential for post-16 (further) education provisions within the Broad Location layout.</i>

B.20.13 SA Objective 13: Economy

Table B.20.13: The assessment of Broad Location at 'Shipston West' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SHIPSTON WEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Shipston.

B.21 Southam Northeast

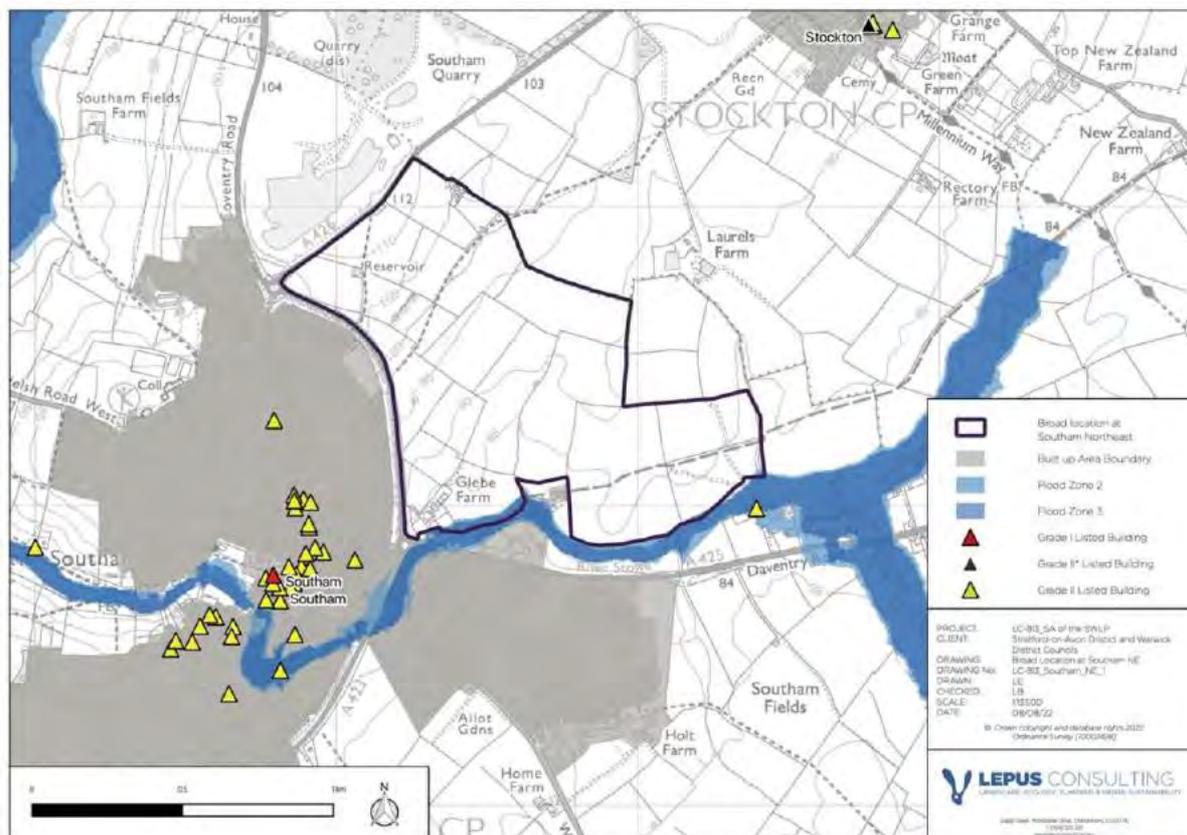


Figure B.21.1: Broad Location at ‘Southam Northeast’ with selected constraints

B.21.1 SA Objective 1: Climate Change

Table B.21.1: The assessment of Broad Location at ‘Southam Northeast’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.21.2 SA Objective 2: Flood Risk

Table B.21.2: The assessment of Broad Location at ‘Southam Northeast’ against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
0	Riparian Flood Zones	-	<p>Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.</p>

Score	SA2: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.21.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.21.3: The assessment of Broad Location at 'Southam Northeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 28.3km northwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	Partially coincides with 'Southam Bypass Cutting' LWS. The development of this Broad Location could result in a minor negative impact on LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	LGS	A	Coincides or is very close to 'Southam Bypass Cutting' LGS. A minor negative impact on this LGS could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Priority Habitats	-	The Broad Location does not coincide with any priority habitat.

B.21.4 SA Objective 4: Landscape

Table B.21.4: The assessment of Broad Location at 'Southam Northeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 13km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of "high/medium" landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>

Score	SA4: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.21.5 SA Objective 5: Cultural Heritage

Table B.21.5: The assessment of Broad Location at 'Southam Northeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	M	Located approximately 100m from Grade II Listed Building 'Napton Road Farmhouse' and approximately 200m from various Grade II Listed Buildings including: '4 Daventry Road'; 'The Woodlands'; and 'The Crown Inn'. A minor negative impact on the setting of these heritage assets would be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	Located approximately 170m from 'Southam' Conservation Area. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Conservation Area.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.21.6 SA Objective 6: Pollution

Table B.21.6: The assessment of Broad Location at 'Southam Northeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Located adjacent to the A423, A425 and A426. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>

Score	SA6: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Located adjacent to the River Stowe. A minor negative impact on this watercourse could be expected. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.21.7 SA Objective 7: Natural Resources

Table B.21.7: The assessment of Broad Location at 'Southam Northeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
--	ALC Grade	M/X	Located wholly upon ALC Grade 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the location wholly coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.21.8 SA Objective 8: Waste

Table B.21.8: The assessment of Broad Location at 'Southam Northeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.21.9 SA Objective 9: Housing

Table B.21.9: The assessment of Broad Location at 'Southam Northeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.21.10 SA Objective 10: Health

Table B.21.10: The assessment of Broad Location at 'Southam Northeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
++	Access to Leisure Facilities	-	A major positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'Southam Leisure Centre and Swimming Pool' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	The Broad Location is adjacent to the A423 and A426, and within 200m of the A425. A minor negative impact on health could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle networks. A minor positive impact on the health and wellbeing is expected.

B.21.11 SA Objective 11: Accessibility

Table B.21.11: The assessment of Broad Location at 'Southam Northeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
-	Railway Station	M	Located wholly outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
-	Connectivity	M	Located within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport and connectivity could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.21.12 SA Objective 12: Education

Table B.21.12: The assessment of Broad Location at 'Southam Northeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Southam St James C of E Academy', 'Southam Primary School' and 'St Mary's Catholic School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the target distance to 'Southam College' secondary school. A minor positive impact on access to secondary education is expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.21.13 SA Objective 13: Economy

Table B.21.13: The assessment of Broad Location at 'Southam Northeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SOUTHAM NORTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.22 Southam Northwest

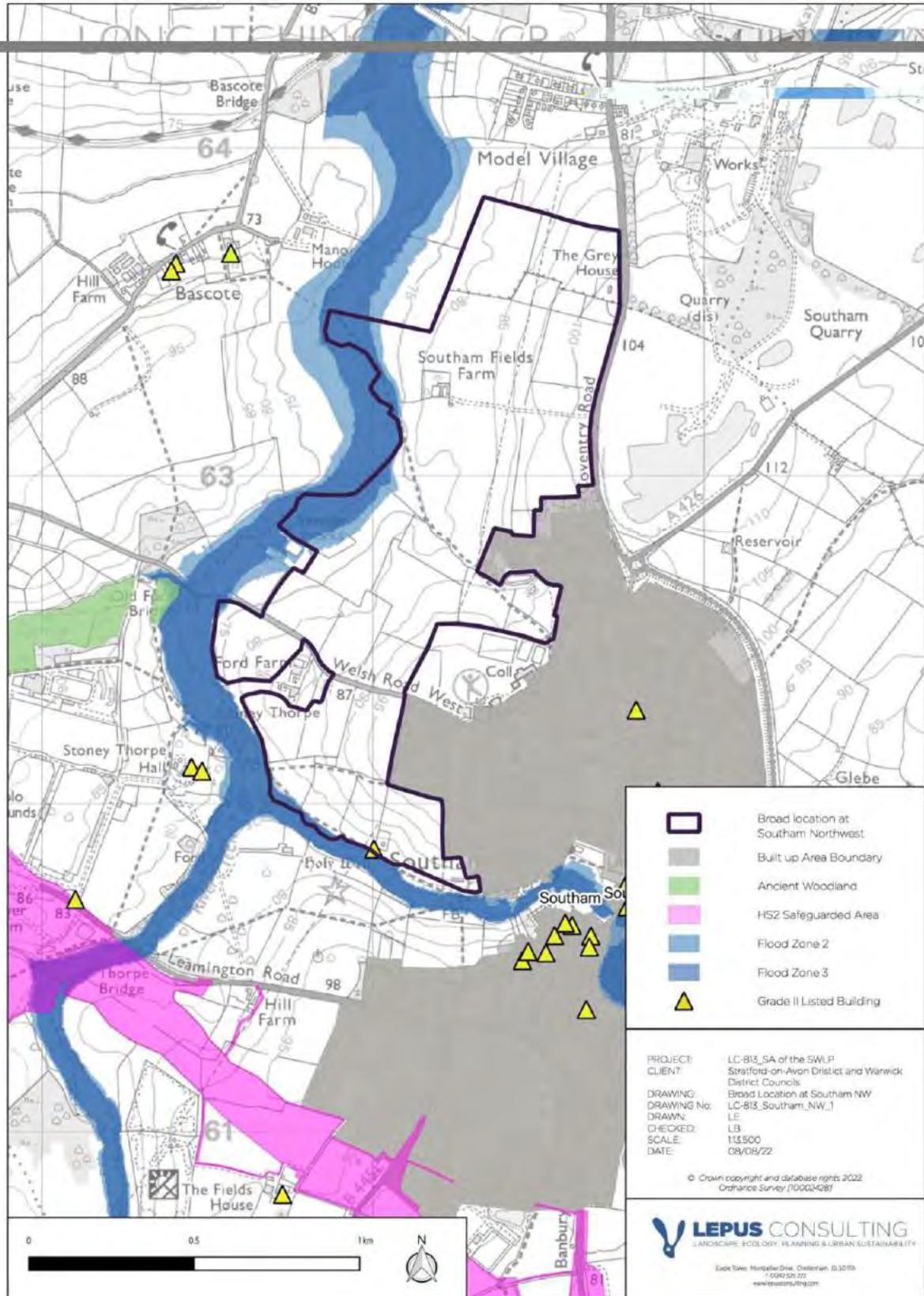


Figure B.22.1: Broad Location at 'Southam Northwest' with selected constraints

B.22.1 SA Objective 1: Climate Change

Table B.22.1: The assessment of Broad Location at 'Southam Northwest' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the district by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.22.2 SA Objective 2: Flood Risk

Table B.22.2: The assessment of Broad Location at 'Southam Northwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.22.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.22.3: The assessment of Broad Location at 'Southam Northwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 27.4km northwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	<p>Approximately 115m from a stand of unnamed ancient woodland and approximately 250m from 'Thorpe Rough' ancient woodland. A minor negative impact on these ancient woodlands could be expected.</p> <p><i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i></p>
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	<p>Coincides with 'Mature Elm' and 'River Itchen' LWSs. The development of this Broad Location could result in a minor negative impact on LWSs.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	Does not coincide with any LGSs.
0	Priority Habitats	-	Does not coincide with any priority habitat.

B.22.4 SA Objective 4: Landscape

Table B.22.4: The assessment of Broad Location at 'Southam Northwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 12.8km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	A/M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. Part of the character area could be enhanced (WCC, 1993). Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Located within areas of 'high', 'high-medium' and a small area of 'medium' landscape sensitivity. A major negative impact on the local landscape could be expected upon development at this location. <i>Mitigation: Avoid developing in areas of high landscape sensitivity. Mitigate through use of landscape-led design practices.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.22.5 SA Objective 5: Cultural Heritage

Table B.22.5: The assessment of Broad Location at 'Southam Northwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A/M	Coincides with Grade II Listed Building 'Holy Well at SP 4100 6186'. A major negative impact on the setting of this heritage asset would be expected. Also located within approximately 330m of Grade II Listed Buildings 'Stoney Thorpe Hall', 'Stoney Thorpe Hall Stable Block and Attached Outbuilding Approximately 10 Metres West of House' and 'Bascote House and Former Builders Outbuildings'. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate through landscape led site design and further heritage assessments to help conserve and enhance the setting of the Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	Located approximately 120m from 'Southam' Conservation Area. A minor negative impact on the setting of this CA would be expected.

Score	SA5: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
			<i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Conservation Area.</i>
--	Scheduled Monument	A	The Broad Location coincides with the Scheduled Monument 'The Holy Well'. As a result, a major negative impact would be expected on the setting of this SM as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.22.6 SA Objective 6: Pollution

Table B.22.6: The assessment of Broad Location at 'Southam Northwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Located adjacent to the A423. A minor negative impact on air and noise pollution could be expected following development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Coincides with the River Itchen and adjacent to the River Stowe. A minor negative impact on these watercourses could be expected as a result of development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.22.7 SA Objective 7: Natural Resources

Table B.22.7: The assessment of Broad Location at 'Southam Northwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 2 and 3 land with a small proportion located within ALC Grade 4. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.22.8 SA Objective 8: Waste

Table B.22.8: The assessment of Broad Location at 'Southam Northwest' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.22.9 SA Objective 9: Housing

Table B.22.9: The assessment of Broad Location at 'Southam Northwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.22.10 SA Objective 10: Health

Table B.22.10: The assessment of Broad Location at 'Southam Northwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Horton General Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
++	Access to Leisure Facilities	-	The majority of the Broad Location is within the target distance to the leisure facility 'Southam Leisure Centre & Swimming Pool'. A major Positive impact on access to these facilities is expected.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	Adjacent to the A423. A minor negative impact on health would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network, with only a small proportion of connectivity to the cycle path networks. A minor positive impact on the health and wellbeing is expected.

B.22.11 SA Objective 11: Accessibility

Table B.22.11: The assessment of Broad Location at 'Southam Northwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
-	Railway Station	M	Located wholly outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
0	Connectivity	-	Located within an area mostly identified as having moderate connectivity to the existing settlement (Grade C), with a small proportion within an area identified as having good connectivity (Grade B). A negligible impact on transport and connectivity could be expected.
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.22.12 SA Objective 12: Education

Table B.22.12: The assessment of Broad Location at 'Southam Northwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Southam St James C of E Academy', 'Southam Primary School' and 'St Mary's Catholic School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Southam College'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.22.13 SA Objective 13: Economy

Table B.22.13: The assessment of Broad Location at 'Southam Northwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SOUTHAM NORTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

Score	SA2: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.23.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.23.3: The assessment of Broad Location at 'Southam Southeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 27.4km northwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs located in proximity to the location.
-	LWSs	A	Adjacent to 'Southam Meadow South' LWS. The development of this Broad Location could result in a minor negative impact on this LWS. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	Does not coincide with any LGSs.
0	Priority Habitats	-	Does not coincide with any priority habitat.

B.23.4 SA Objective 4: Landscape

Table B.23.4: The assessment of Broad Location at 'Southam Southeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 11km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	M	Located within areas of 'medium' landscape sensitivity. Overall landscape sensitivity value may degrade with the introduction of the HS2 rail route. <i>Mitigation: Avoid developing in areas of high landscape sensitivity. Mitigate through use of landscape-led design practices.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.

Score	SA4: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.23.5 SA Objective 5: Cultural Heritage

Table B.23.5: The assessment of Broad Location at 'Southam Southeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	M	A minor negative impact on Grade II Listed Building 'Napton Road Farmhouse', located approximately 180m from the Broad Location, could be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of the Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	Located approximately 180m from 'Southam' Conservation Area. A minor negative impact on the setting of this CA could be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Conservation Area.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.23.6 SA Objective 6: Pollution

Table B.23.6: The assessment of Broad Location at 'Southam Southeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Located adjacent to the A423 and A425. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Coincides slightly with and adjacent to the River Stowe. A minor negative impact on these watercourses could be expected. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.23.7 SA Objective 7: Natural Resources

Table B.23.7: The assessment of Broad Location at 'Southam Southeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
--	ALC Grade	M/X	<p>Located upon ALC Grades 3 land with a proportion located within ALC Grade 4. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource.</p> <p><i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i></p>
-	Mineral Safeguarding Areas	M/X	<p>A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA.</p> <p><i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i></p>

B.23.8 SA Objective 8: Waste

Table B.23.8: The assessment of Broad Location at 'Southam Southeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
--	Potential increase in household waste generation	M	<p>Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected.</p> <p><i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i></p>

B.23.9 SA Objective 9: Housing

Table B.23.9: The assessment of Broad Location at 'Southam Southeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
++	Housing provision	-	<p>Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.</p>

B.23.10 SA Objective 10: Health

Table B.23.10: The assessment of Broad Location at 'Southam Southeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
-	NHS Hospital with A&E Department	M	<p>A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'.</p> <p><i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i></p>

Score	SA10: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
+	Access to Leisure Facilities	-	A minor positive impact on health would be expected as the Broad Location is within the sustainable target distance to 'Southam Leisure Centre and Swimming Pool' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	The Broad Location is adjacent to the A423 and A425. A minor negative impact on health would be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle path networks. A minor positive impact on the health and wellbeing is expected.

B.23.11 SA Objective 11: Accessibility

Table B.23.11: The assessment of Broad Location at 'Southam Southeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
-	Railway Station	M	Located wholly outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
-	Connectivity	M	Located within an area mostly identified as having poor connectivity to the existing settlement (Grade D), with a small proportion within an area identified as having moderate connectivity (Grade C). A minor negative impact on transport and connectivity could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.23.12 SA Objective 12: Education

Table B.23.12: The assessment of Broad Location at 'Southam Southeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Southam St James C of E Academy', 'Southam Primary School' and 'St Mary's Catholic School'. A minor positive impact on access to primary educational facilities would be expected.

Score	SA12: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Southam College'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.23.13 SA Objective 13: Economy

Table B.23.13: The assessment of Broad Location at 'Southam Southeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SOUTHAM SOUTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.24 Southam Southwest

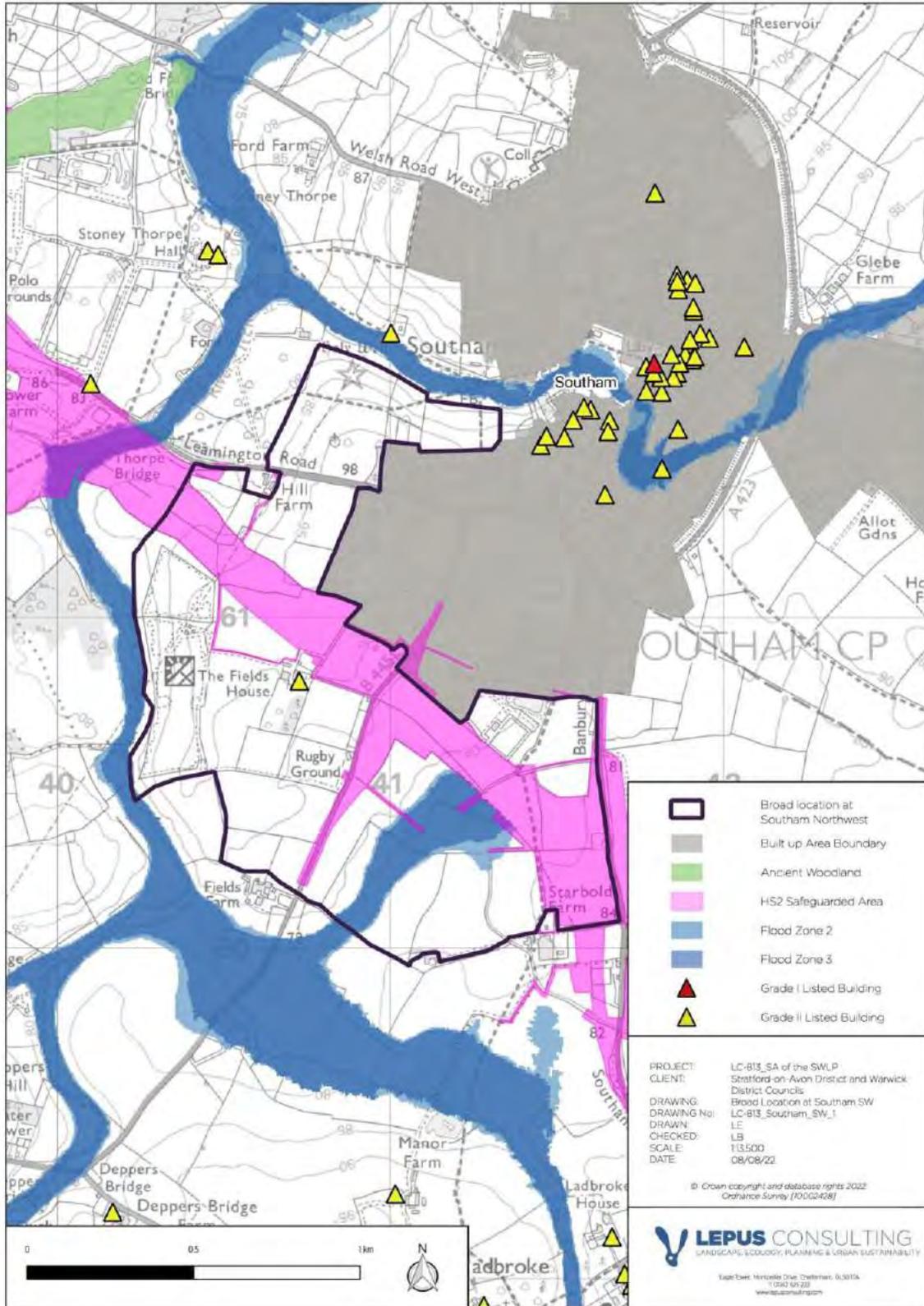


Figure B.24.1: Broad Location at 'Southam Southwest' with selected constraints

B.24.1 SA Objective 1: Climate Change

Table B.24.1: The assessment of Broad Location at 'Southam Southwest' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.24.2 SA Objective 2: Flood Risk

Table B.24.2: The assessment of Broad Location at 'Southam Southwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.24.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.24.3: The assessment of Broad Location at 'Southam Southwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 29km northwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process..</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs located in proximity to the location.
-	LWSs	A	<p>Coincides with 'Hill Farm Wood' and located adjacent to 'Ufton Hill Farm Fields' LWS. The development of this Broad Location could result in a minor negative impact on LWSs.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	Does not coincide with any LGSs.
0	Priority Habitats	-	Does not coincide with any priority habitat.

B.24.4 SA Objective 4: Landscape

Table B.24.4: The assessment of Broad Location at 'Southam Southwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 11km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	M	Located within areas of 'high-medium' and 'medium' landscape sensitivity. It should be noted that this broad location is coincident with large parts of the proposed HS2 railway line. The construction and operation of the HS2 route is likely to impact landscape sensitivity and reduce the overall value of the landscape quality. The northern part of the BL includes an Area of Restraint landscape designation which would need to be avoided and designed into GI proposals. <i>Mitigation: Avoid developing in areas of high landscape sensitivity. Mitigate through use of landscape-led design practices.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRoW Users	M	Coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.24.5 SA Objective 5: Cultural Heritage

Table B.24.5: The assessment of Broad Location at 'Southam Southwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A/M	Coincides with Grade II Listed Building 'The Fields House'. A major negative impact on the setting of this heritage asset could be expected. Also located within approximately 110m of Grade II Listed Buildings 'Holy Well', '24 and 26 Warwick Road' and 'Whitehall House and Number 9'. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate through landscape led site design and further heritage assessments to help conserve and enhance the setting of the Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	Located approximately 80m from 'Southam' Conservation Area. A minor negative impact on the setting of this CA would be expected.

Score	SA5: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
			<i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Conservation Area.</i>
-	Scheduled Monument	M	Located approximately 90m from 'The Holy Well' Scheduled Monument. A minor negative impact on the setting of this SM would be expected as a result of development. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Scheduled Monument.</i>

B.24.6 SA Objective 6: Pollution

Table B.24.6: The assessment of Broad Location at 'Southam Southwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A425 and located adjacent to the A423. A minor negative impact on air and noise pollution could be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	Adjacent to the River Itchen and approximately 30m from the River Stowe. A minor negative impact on these watercourses could be expected. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.24.7 SA Objective 7: Natural Resources

Table B.24.7: The assessment of Broad Location at 'Southam Southwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
--	ALC Grade	M/X	Located upon ALC Grades 3 land with a proportion located within ALC Grade 4. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.24.8 SA Objective 8: Waste

Table B.24.8: The assessment of Broad Location at 'Southam Southwest' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.24.9 SA Objective 9: Housing

Table B.24.9: The assessment of Broad Location at 'Southam Southwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.24.10 SA Objective 10: Health

Table B.24.10: The assessment of Broad Location at 'Southam Southwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	The majority of the Broad Location is located within the target distance to a GP Surgery. A minor positive impact would be expected for access to GP surgeries.
+	Access to Leisure Facilities	-	A minor positive impact on health could be expected as the majority of the Broad Location is within the sustainable target distance to 'Southam Leisure Centre and Swimming Pool' leisure facility.
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A425 and located adjacent to the A423. A minor negative impact on health would be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	The majority of the Broad Location is within the target distance to the PRow and cycle path networks. A minor positive impact on the health and wellbeing is expected.

B.24.11 SA Objective 11: Accessibility

Table B.24.11: The assessment of Broad Location at 'Southam Southwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
-	Railway Station	M	Located wholly outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
0	Connectivity	-	Located within an area mostly identified as having moderate connectivity to the existing settlement (Grade C). A negligible impact on transport and connectivity could be expected.
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.24.12 SA Objective 12: Education

Table B.24.12: The assessment of Broad Location at 'Southam Southwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Southam Primary School' and 'St Mary's Catholic School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Southam College'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.24.13 SA Objective 13: Economy

Table B.24.13: The assessment of Broad Location at 'Southam Southwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SOUTHAM SOUTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.25 Stratford-upon-Avon East

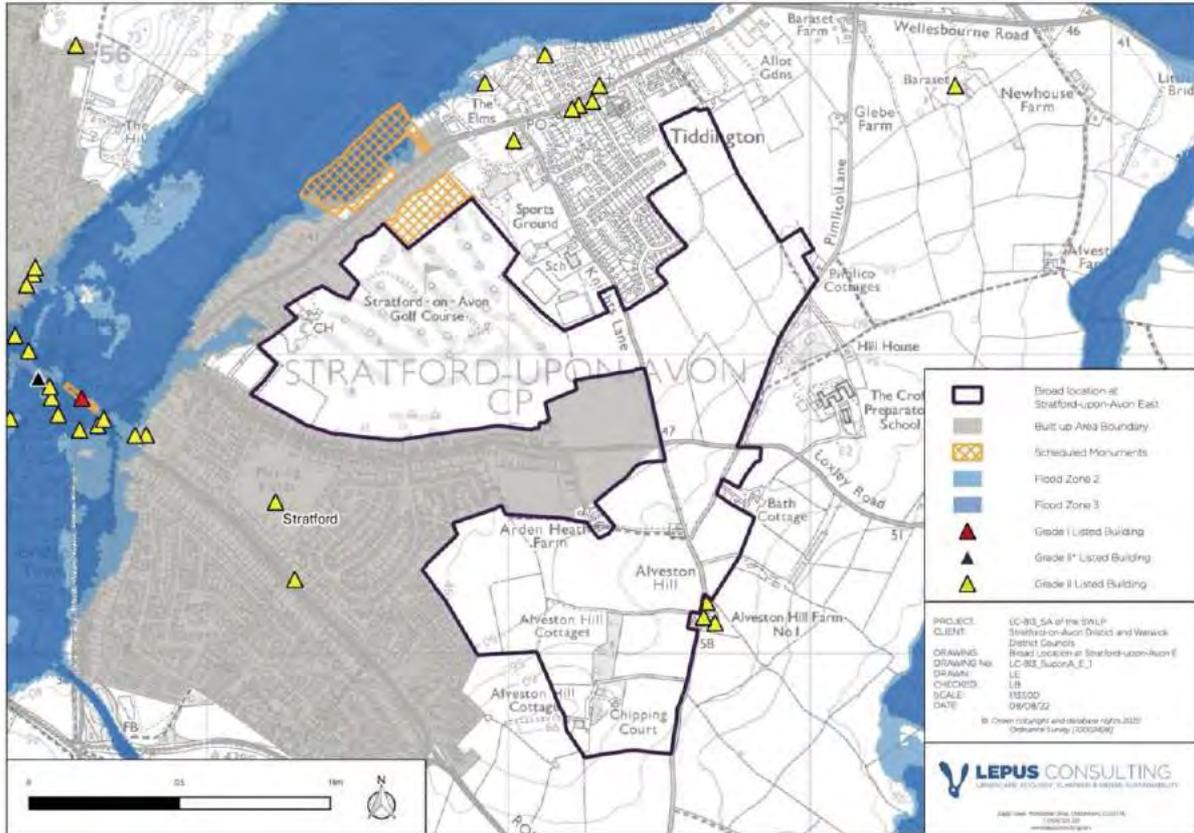


Figure B.25.1: Broad Location at ‘Stratford-upon-Avon East’ with selected constraints

B.25.1 SA Objective 1: Climate Change

Table B.25.1: The assessment of Broad Location at ‘Stratford-upon-Avon East’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.25.2 SA Objective 2: Flood Risk

Table B.25.2: The assessment of Broad Location at ‘Stratford-upon-Avon East’ against SA Objective 2 (Flood)

Risk)

Score	SA2: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
+	Riparian Flood Zones	-	This Broad Location wholly lies within Flood Zone 1.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.25.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.25.3: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 27km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	Adjacent to 'The Croft Preparatory School Plantation' LWS. The development of this Broad Location could result in a minor negative impact on this LWS. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.25.4 SA Objective 4: Landscape

Table B.25.4: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 8km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Avon Character Area, Terrace Farmlands. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
-	Landscape Sensitivity	M	The landscape in this Broad Location is identified as being predominantly of 'medium' sensitivity to housing development in the White's study. Development in areas identified as being of higher landscape sensitivity could result in minor negative impacts on the character of the local landscape. <i>Mitigation: Seek to reduce landscape impacts by avoidance of more sensitive landscapes, the appropriate design of GI provision to integrate development into the landscape and through the layout and design of built form.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	A negligible effect is likely since the BL is in a location that already has development on three sides of the search area which includes Tiddington village, Bridge Town and the ribbon development that lies along the B4086 road.

B.25.5 SA Objective 5: Cultural Heritage

Table B.25.5: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	A/M	There is potential for a minor negative impact on the setting of various Grade II Listed Building located near the Broad Location such as: 'Alveston Hill Farmhouse'; 'Cart Shed Approximately 70 Metres northwest of Alveston Hill Farmhouse'; and 'Barn and Attached Range Immediately northwest of Alveston Hill'. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate, if possible, through landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	A small proportion of the Broad Location coincides with Stratford-on-Avon CA and Alveston CA is located approximately 700m from the Broad Location, separated by open space. A minor negative impact on the setting of this CA would be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
-	Scheduled Monument	M	The Broad Location is adjacent to 'Tiddington Roman Settlement' SM. A minor negative impact on the settings of the SM and on local cultural heritage could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate, if possible, through landscape led site design and further heritage assessments to help</i>

Score	SA5: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
			<i>conserve and enhance the setting of this Scheduled Monument.</i>

B.25.6 SA Objective 6: Pollution

Table B.25.6: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
-	AQMA	A/M	A proportion of the Broad Location coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
0	Watercourses	-	There are no watercourses in proximity of the location
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.25.7 SA Objective 7: Natural Resources

Table B.25.7: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
--	ALC Grade	M/X	A large proportion of the Broad Location is on ALC Grade 2 land, with areas also located on Grade 3, 4 and Urban land. Development on Grade 2 land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location wholly coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.25.8 SA Objective 8: Waste

Table B.25.8: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the</i>

Score	SA8: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
			<i>waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.25.9 SA Objective 9: Housing

Table B.25.9: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.25.10 SA Objective 10: Health

Table B.25.10: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
+	Access to Leisure Facilities	-	The Broad Location is within the sustainable target distance to 'Stratford Leisure Centre' leisure facility. A minor positive impact would be expected on access to leisure facilities.
-	AQMA	A/M	Coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

B.25.11 SA Objective 11: Accessibility

Table B.25.11: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 11

(Accessibility)

Score	SA11: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the Broad Location is located within the target distance to a bus stop providing regular services.
+	Railway Station	-	The Broad Location is within the target distance to a railway station. A minor positive impact would be expected on end users' access to rail transport.
-	Connectivity	M	Part of the Broad Location lies within an area identified as having poor connectivity to the existing settlement (Grade D). Other parts of the BL are better at Grade B in the Council's evaluation of connectivity. Drawing on the precautionary principle, a minor adverse effect on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	A large proportion is located outside of the sustainable target distance to a food store. A minor positive impact on access to food stores could be expected. <i>Mitigation: Potential for food stores to be included within the site layout.</i>

B.25.12 SA Objective 12: Education

Table B.25.12: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Alveston C of E Primary School' and 'Bridgetown Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'King Edward VI School' and 'St Mary's Catholic School'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.25.13 SA Objective 13: Economy

Table B.25.13: The assessment of Broad Location at 'Stratford-upon-Avon East' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	STRATFORD-UPON-AVON EAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Stratford-upon-Avon.

B.26 Stratford-upon-Avon Northeast

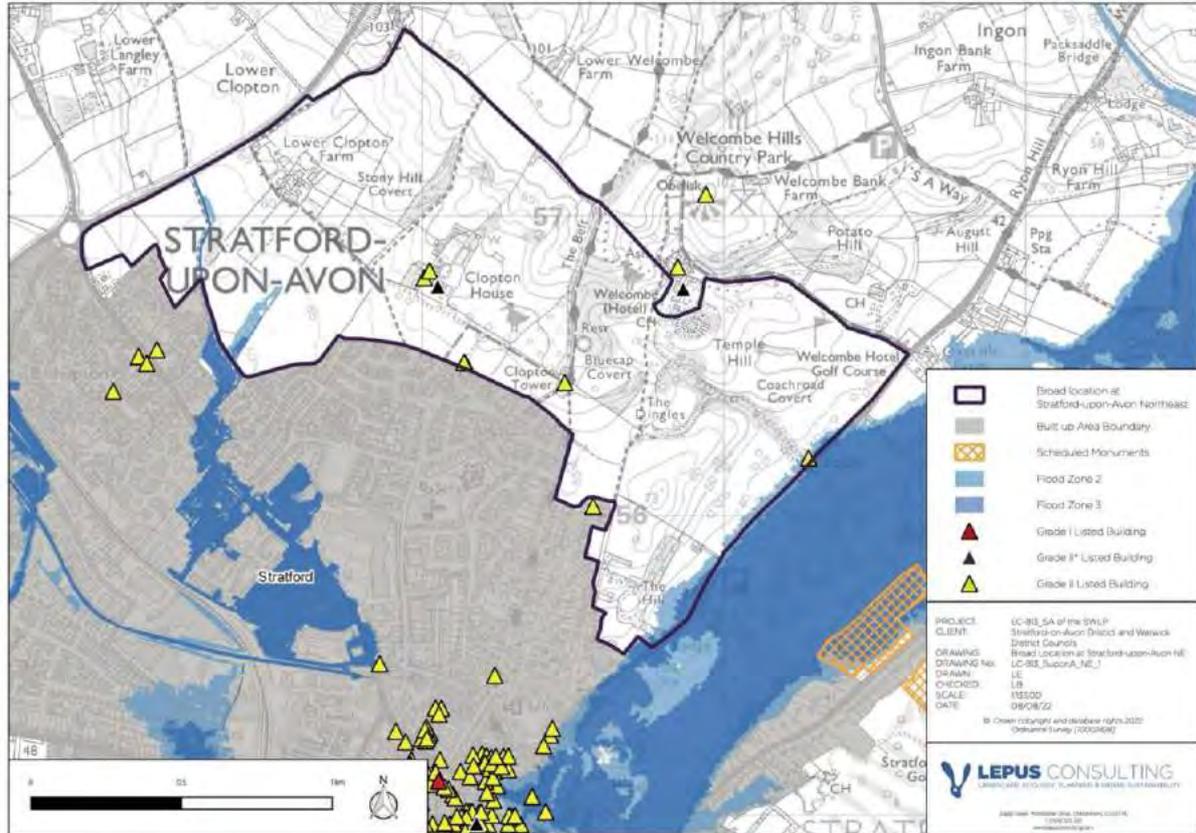


Figure B.26.1: Broad Location at 'Stratford-upon-Avon Northeast' with selected constraints

B.26.1 SA Objective 1: Climate Change

Table B.26.1: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.26.2 SA Objective 2: Flood Risk

Table B.26.2: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.26.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.26.3: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 26km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There is no ancient woodland in close proximity to the location.
--	LNRs	A	A major negative impact on LNRs could be expected as a large proportion of the Broad Location coincides with 'Welcombe Hills' LNR. <i>Mitigation: Only a complex solution will avoid irreversible impacts.</i>
-	LWSs	A	A minor negative impact on LWSs could be expected as the Broad Location coincides with various LWSs such as: 'Clopton House Meadow'; 'Welcombe Estate'; and 'Bishopston Meadow'. The Broad Location is also adjacent to 'The Lench Meadows' LWS. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.26.4 SA Objective 4: Landscape

Table B.26.4: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 9km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
-	Landscape Character	M	Located within Avon Character Area, Vale Orchard Belt. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. Includes areas of the landscape suitable for enhancement in the 1993 Landscape Project. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	The landscape in this Broad Location is identified as being of 'high', 'high-medium' and 'medium' sensitivity to housing development in the White's study. Development in areas identified as being of higher landscape sensitivity could result in major negative impacts on the character of the local landscape. <i>Mitigation: Seek to reduce landscape impacts by avoidance of more sensitive landscapes, the appropriate design of GI provision to integrate development into the landscape and though the layout and design of built form.</i>
-	Special Landscape Areas	M	The Broad Location wholly coincides with 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
-	Country Parks	M	Located in close proximity to Welcombe Hills Country Park; possibly coincident with the designation although at the time of writing a digital file of the extent of the park was not available. <i>Mitigation: Reduce impacts through the location and layout of future proposals.</i>
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.26.5 SA Objective 5: Cultural Heritage

Table B.26.5: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
--	Grade II* Listed Building	A	There is potential for a major negative impact on the setting of a Grade II* Listed Building which coincides with the Broad Location: 'Clopton House And Attached Former Stable Block, Walls and Gate Piers. A minor negative impact could also be expected on the setting of Grade II* Listed Building 'Welcombe Hotel' which is located approximately 45m from the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
--	Grade II Listed Building	A	There is potential for a minor negative impact on the setting of various Grade II Listed Buildings which coincide with the Broad Location such as: 'Lodge To Welcombe Hotel'; 'Clopton Tower'; and 'Gate Pier to Former Entrance to Clopton Park, To East of Road'

Score	SA5: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	Stratford-on-Avon CA is located adjacent to the Broad Location. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	The Broad Location is located approximately 470m from the 'Tiddington Roman Settlement' SM. Due to the nature of existing development between this Scheduled Monument and the Broad Location, a negligible impact on local cultural heritage would be expected.

B.26.6 SA Objective 6: Pollution

Table B.26.6: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
-	AQMA	A/M	A proportion of the Broad Location coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on air and noise pollution would be expected as the A3400, A439 and A46 are located less than 200m from the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	The River Avon is located approximately 135m from the Broad Location. As a result, a minor negative impact on this watercourse would be expected as a result of development at the Broad Location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
-	Groundwater SPZ	M	The Broad Location coincides with SPZ 1, 1C and 2C. Development could have a minor negative impact Ground water SPZs <i>Mitigation: Appropriate management of construction and appropriate design measures to prevent pollution of the groundwater.</i>

B.26.7 SA Objective 7: Natural Resources

Table B.26.7: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
--	ALC Grade	M/X	A large proportion of the Broad Location is on ALC Grade 3 land, with smaller proportions situated on Grade 4 and Urban land. Development on Grade 3 land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location partially coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversable uses.</i>

B.26.8 SA Objective 8: Waste

Table B.26.8: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.26.9 SA Objective 9: Housing

Table B.26.9: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.26.10 SA Objective 10: Health

Table B.26.10: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
+	Access to Leisure Facilities	-	The Broad Location is within the sustainable target distance to 'Stratford Leisure Centre' leisure facility. A minor positive impact would be expected on access to leisure facilities.
-	AQMA	A/M	Coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on could be expected as the A3400, A439 and A46 is located less than 200m from the Broad Location. Traffic on these roads would be likely to expose some end users to air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network with a small proportion of connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.26.11 SA Objective 11: Accessibility

Table B.26.11: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
++	Railway Station	-	Majority of the BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
0	Connectivity	-	The majority of the Broad Location lies within areas of good and moderate connectivity, a proportion in the to the north sis within an area of poor connectivity. A negligible effect might be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.26.12 SA Objective 12: Education

Table B.26.12: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Thomas Jolyffe Primary School' and 'St Gregory's Catholic Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'King Edward IV School' and 'Stratford-upon-Avon School'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.26.13 SA Objective 13: Economy

Table B.26.13: The assessment of Broad Location at 'Stratford-upon-Avon Northeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Stratford-upon-Avon.

B.27 Stratford-upon-Avon Northwest

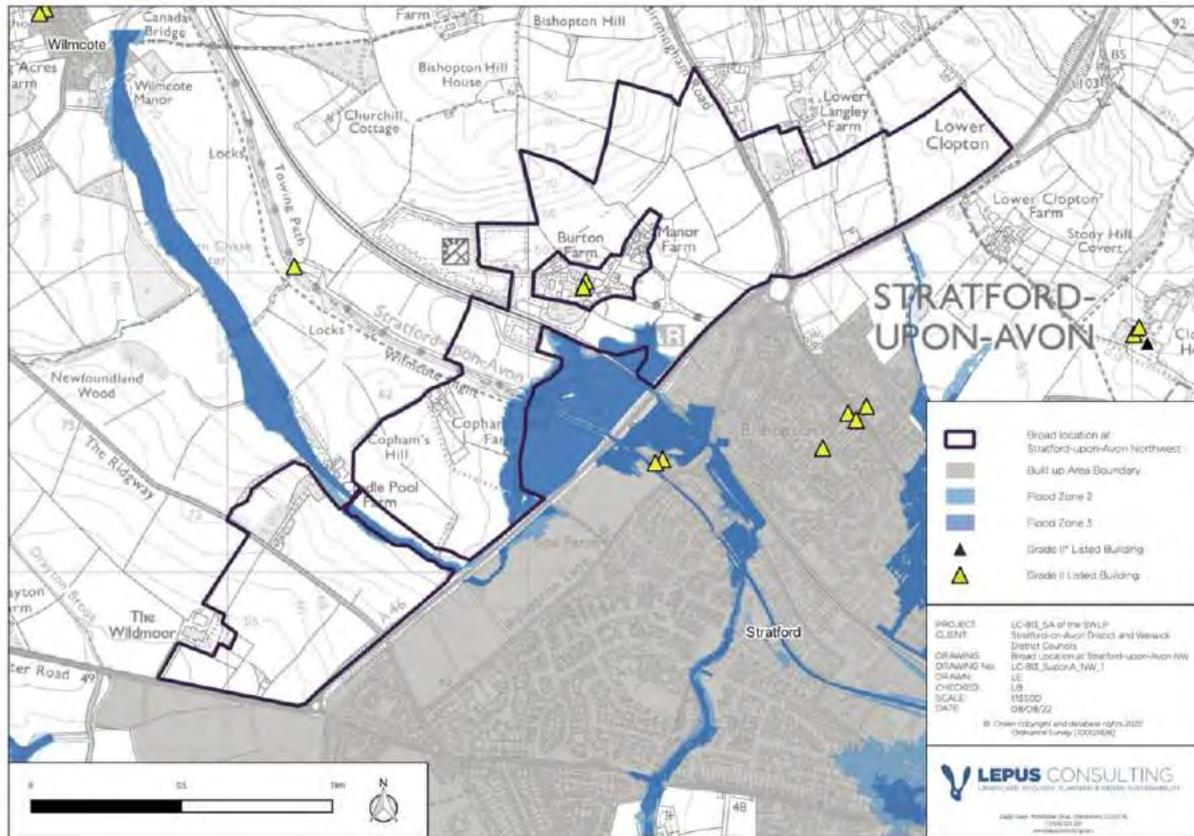


Figure B.27.1: Broad Location at ‘Stratford-upon-Avon Northwest’ with selected constraints

B.27.1 SA Objective 1: Climate Change

Table B.27.1: The assessment of Broad Location at ‘Stratford-upon-Avon Northwest’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.27.2 SA Objective 2: Flood Risk

Table B.27.2: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.27.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.27.3: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 24km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There is no ancient woodland in close proximity to the location.
0	LNRs	-	Unlikely to adversely affect any LNR.
-	LWSs	A	The Broad Location coincides with 'Wildmoor', 'Stratford on Avon Canal' and 'River Avon and Tributaries' LWSs. Minor adverse effect could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland' 'traditional orchard', 'lowland meadows', hedgerows and possibly veteran trees. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.27.4 SA Objective 4: Landscape

Table B.27.4: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 9km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Avon Character Area, Vale Orchard Belt. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise.

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
			<i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	The landscape in this Broad Location is identified as being of 'high-medium' sensitivity to housing development in the White's study. Development in areas identified as being of higher landscape sensitivity could result in major negative impacts on the character of the local landscape. It should be noted that parts of the BL have no landscape evaluation and depending on results of fieldwork, this SA score could change. <i>Mitigation: Seek to reduce landscape impacts by avoidance of more sensitive landscapes, the appropriate design of GI provision to integrate development into the landscape and through the layout and design of built form.</i>
-	Special Landscape Areas	M	The Broad Location partially coincides with 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.27.5 SA Objective 5: Cultural Heritage

Table B.27.5: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	A/M	There is potential for a minor negative impact on the setting of various Grade II Listed Buildings which are located near the Broad Location, such as: 'Barn Approximately 10 Metres southwest Of Burton Farmhouse (Burton Farmhouse Not Included)'. 'The Pump House'; and 'Victoria Spa Lodge and Bruce Lodge'. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate, if possible, through landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.27.6 SA Objective 6: Pollution

Table B.27.6: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
-	AQMA	A/M	Located adjacent to 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles</i>
-	Main Road	A/M	A minor negative impact on air and noise pollution would be expected as the A3400 runs through the Broad Location, with the A46 running adjacent to the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	A minor negative impact could be expected as a railway line runs through the Broad Location, and development would be likely to expose some end users to higher levels of transport-associated air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Watercourses	M	The South Stratford Canal coincides with the Broad Location. As a result, a minor negative impact on this watercourse may occur following development at the Broad Location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.27.7 SA Objective 7: Natural Resources

Table B.27.7: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
--	ALC Grade	M/X	A large proportion of the Broad Location is on ALC Grade 3 land, with a proportion situated on Grade 4 land. Development on Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
0	Mineral Safeguarding Areas	-	Does not coincide with an MSA.

B.27.8 SA Objective 8: Waste

Table B.27.8: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 8

(Waste)

Score	SA8: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.27.9 SA Objective 9: Housing

Table B.27.9: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.27.10 SA Objective 10: Health

Table B.27.10: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
-	AQMA	A/M	Located adjacent to 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on could be expected as the A3400 coincides with the Broad Location and the A46 is

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
			located adjacent to the Broad Location. Traffic on these roads would be likely to expose some end users to air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle networks. A minor positive impact on the health and wellbeing is expected.

B.27.11 SA Objective 11: Accessibility

Table B.27.11: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
++	Railway Station	-	Majority of the BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
0	Connectivity	-	Unlikely to have an impact on transport as a large proportion of the Broad Location lies within an area identified as having moderate connectivity to the existing settlement (Grade C).
-	Food stores	M	The Broad Location is situated outside of the sustainable target distance to food stores. A minor negative impact on access to food stores would be expected. <i>Mitigation: Potential for food stores to be included within the site layout.</i>

B.27.12 SA Objective 12: Education

Table B.27.12: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Bishopston Primary School'. A minor positive impact on access to primary educational facilities would be expected.
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside of the sustainable target distance of any secondary schools. <i>Mitigation: Potential for secondary education provision or improvements to public transport and active travel connectivity within the Broad Location layout and design.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.27.13 SA Objective 13: Economy

Table B.27.13: The assessment of Broad Location at 'Stratford-upon-Avon Northwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	STRATFORD-UPON-AVON NORTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Stratford-upon-Avon.

B.28 Stratford-upon-Avon South

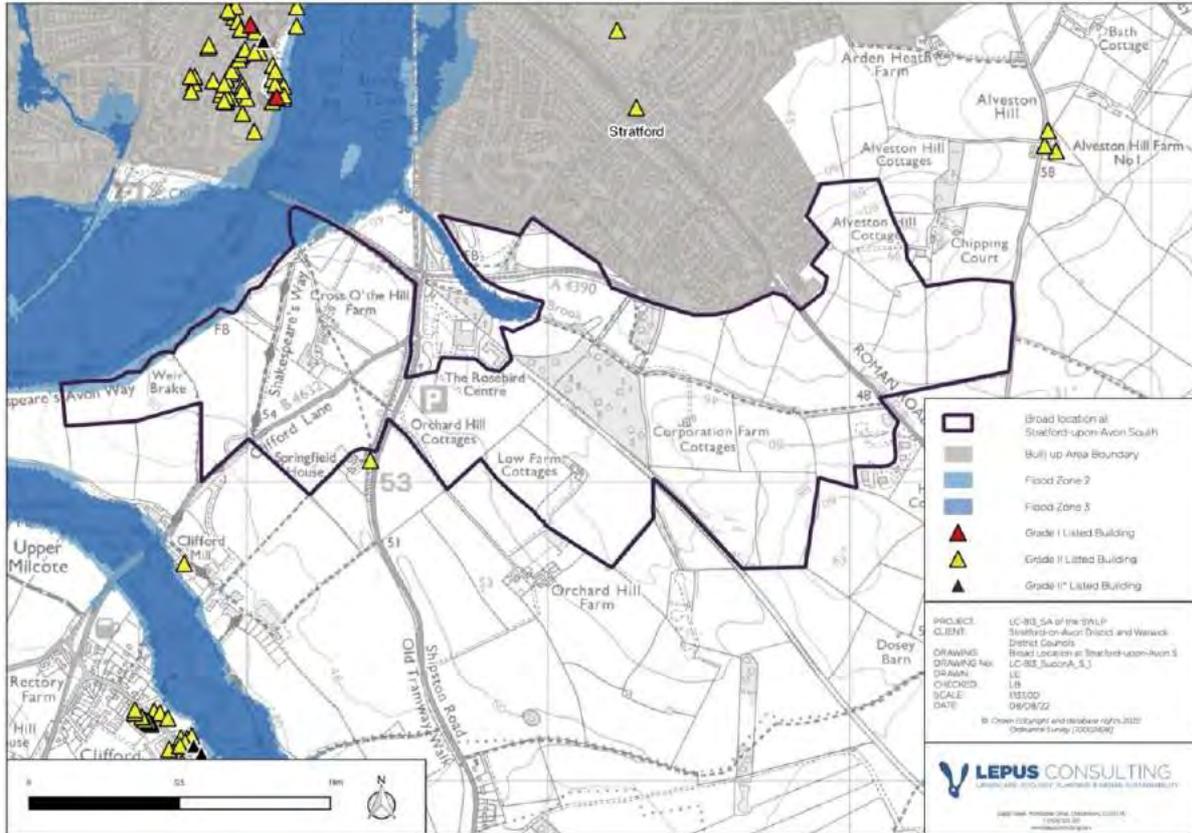


Figure B.28.1: Broad Location at ‘Stratford-upon-Avon South’ with selected constraints

B.28.1 SA Objective 1: Climate Change

Table B.28.1: The assessment of Broad Location at ‘Stratford-upon-Avon South’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.28.2 SA Objective 2: Flood Risk

Table B.28.2: The assessment of Broad Location at ‘Stratford-upon-Avon South’ against SA Objective 2 (Flood

Risk)

Score	SA2: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.28.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.28.3: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 24km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
-	SSSIs	A	A minor negative impact could be expected as 'Racecourse Meadow' SSSI is located approximately 750m from the Broad Location. A small proportion of the Broad Location coincides with an SSSI IRZ which requires consultation for residential development for 100 units or more. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact could be expected on various LWSs which coincide with the Broad Location, such as: 'Bridgetown Site', 'Disused Railway'; and the adjacent 'River Avon and Tributaries' and 'Riparian Wood'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland' and 'traditional orchard'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.28.4 SA Objective 4: Landscape

Table B.28.4: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
0	National Landscapes/AONBs	-	Located approximately 7km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Avon Character Area, Terrace Farmlands. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
			arise. Includes areas of the landscape suitable for enhancement in the 1993 Landscape Project. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high/medium' and 'medium' landscape sensitivity. The western part of the BL includes an Area of Restraint landscape designation which would need to be avoided and designed into GI proposals. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.28.5 SA Objective 5: Cultural Heritage

Table B.28.5: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
0	Grade I Listed Building	-	Nearest Grade I Listed Building 'Church of Holy Trinity' which is located approximately 370m from the Broad Location. Negligible effect is likely.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	A/M	There is potential for a minor negative impact on the setting of various Grade II Listed Buildings which are located less than 500m from the Broad Location, such as: 'Springfield Bridge'; 'Clifford Forge House'; and 'The Crofts Farmhouse and Attached Outbuilding and Barn'. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate through landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	Stratford-on-Avon CA slightly coincide with the Broad Location and 'Clifford Chambers CA' is located approximately 700m from the Broad Location, separated by open space. A minor negative impact on the setting of these CAs could be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.28.6 SA Objective 6: Pollution

Table B.28.6: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
-	AQMA	A/M	Coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact on air quality and noise pollution would be likely. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles</i>
-	Main Road	A/M	A minor negative impact on air and noise pollution could be expected as the A422, A4390 and A3400 coincide with the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	The River Avon is located approximately 20m from the Broad Location. A minor negative impact on this watercourse would be expected as a result of development at the Broad Location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.28.7 SA Objective 7: Natural Resources

Table B.28.7: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
--	ALC Grade	M/X	A large proportion of the Broad Location is on ALC Grade 3 and Grade 2 land, with smaller proportions located on Grade 4 and Urban land. Development on Grade 2 or Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location wholly coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.28.8 SA Objective 8: Waste

Table B.28.8: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.28.9 SA Objective 9: Housing

Table B.28.9: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.28.10 SA Objective 10: Health

Table B.28.10: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
++	Access to GP Surgery	-	A major positive impact would be expected as the majority of Broad Location is located within the target distance to a GP Surgery.
+	Access to Leisure Facilities	-	The Broad Location is within the sustainable target distance to 'Stratford Leisure Centre' leisure facility. A minor positive impact would be expected on access to leisure facilities.
-	AQMA	A/M	Coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Main Road	A/M	A minor negative impact on could be expected as the A422, A4390 and A3400 coincides with the Broad Location. Traffic on these roads would be likely to expose some end users to air and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain</i>

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
			<i>and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle networks. A minor positive impact on the health and wellbeing is expected.

B.28.11 SA Objective 11: Accessibility

Table B.28.11: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the Broad Location is located within the target distance to a bus stop providing regular services.
+	Railway Station	-	The Broad Location is within the sustainable target distance to a railway station. A minor positive impact on site end users' access to rail services is expected.
	Connectivity	-	Data not available.
+	Food stores	-	A large proportion is within the sustainable target distance to these facilities. A minor positive impact on access to food stores could be expected. A large proportion is within the sustainable target distance to these facilities. A minor positive impact on access to food stores could be expected.

B.28.12 SA Objective 12: Education

Table B.28.12: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Bridgetown Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'King Edward IV School'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.28.13 SA Objective 13: Economy

Table B.28.13: The assessment of Broad Location at 'Stratford-upon-Avon South' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential

Score	SA13: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTH: Description of effect
			impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Stratford-upon-Avon.

B.29 Stratford-upon-Avon Southwest

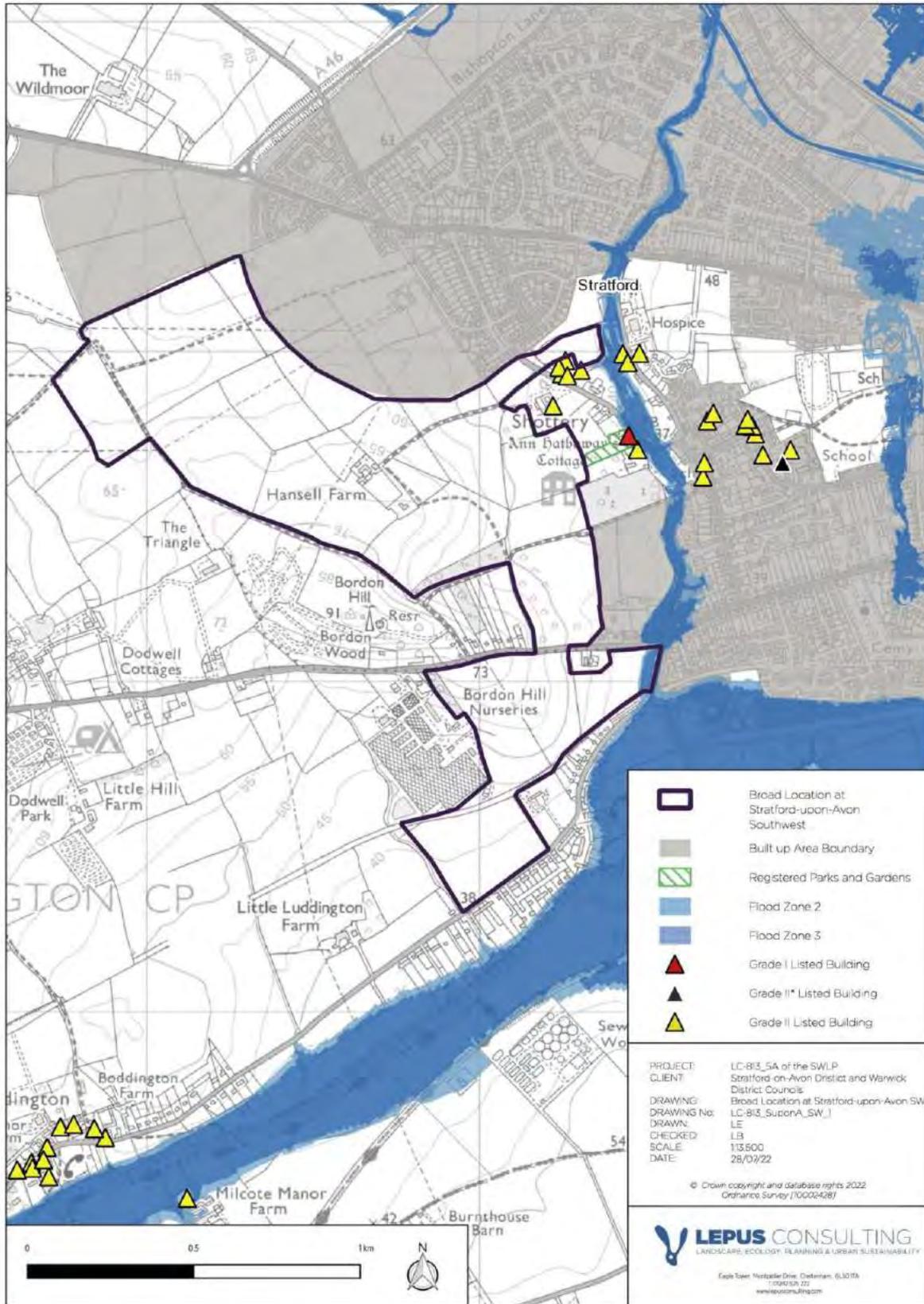


Figure B.29.1: Broad Location at 'Stratford-upon-Avon Southwest' with selected constraints

B.29.1 SA Objective 1: Climate Change

Table B.29.1: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.29.2 SA Objective 2: Flood Risk

Table B.29.2: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.29.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.29.3: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Bredon Hill' SAC located approximately 23km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
-	SSSIs	A	<p>A minor negative impact could be expected as 'Racecourse Meadow' SSSI is located approximately 230m from the Broad Location. A small proportion of the Broad Location coincides with an SSSI IRZ which requires consultation for residential development for 100 units or more.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A	A minor negative impact on 'Bordon Hill Old Rifle Range', 'River Avon and Tributaries' and 'The Triangle Hedgerow' LWSs could be expected as they coincide with the Broad Location.

Score	SA3: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	The Broad Location does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.29.4 SA Objective 4: Landscape

Table B.29.4: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 7km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Avon Character Area, Vale Orchard Belt. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	The landscape in this Broad Location is identified as being of 'high-medium' and 'high' sensitivity to housing development in the White's study. There is a very small area of 'medium' sensitivity to the north. Development in areas identified as being of higher landscape sensitivity could result in major negative impacts on the character of the local landscape. A very small part in the east of the BL includes an Area of Restraint landscape designation which would need to be avoided and designed into GI proposals; this land also forms the likely setting to several listed buildings and Ann Hathaway's Cottage. <i>Mitigation: Seek to reduce landscape impacts by avoidance of more sensitive landscapes, the appropriate design of GI provision to integrate development into the landscape and through the layout and design of built form.</i>
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.29.5 SA Objective 5: Cultural Heritage

Table B.29.5: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' South' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
--	Grade I Listed Building	A/M	There is potential for a major negative impact on the setting of Grade I Listed Building 'Anne Hathaway's Cottage' which is located approximately 150m from the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate through landscape led site design and further heritage assessments to help conserve and enhance the setting of this Listed Building. Mitigation likely to be complex.</i>
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	A/M	There is potential for a minor negative impact on the setting of various Grade II Listed Buildings which are located within 200m of the Broad Location, such as: '1-6 Hathaway Hamlet'; '7-10 Hathaway Hamlet'; and 'Church Cottage'. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate through landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
--	Registered Parks and Gardens	A	A major negative impact on 'Anne Hathaway's Cottage' RPG can be expected as it is located adjacent to the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigation likely to be complex.</i>
-	Conservation Area	M	'Shottery' CA coincides with the Broad Location. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.29.6 SA Objective 6: Pollution

Table B.29.6: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
-	AQMA	A/M	Coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact has been identified. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourses	M	The River Avon slightly coincides with the Broad Location. A minor negative impact on this watercourse would be expected as a result of development at the Broad Location.

Score	SA6: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
			<i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.29.7 SA Objective 7: Natural Resources

Table B.29.7: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
--	ALC Grade	M/X	A large proportion of the Broad Location is on ALC Grade 3 or Grade 2 land, with small proportions located on Grade 4 and Urban land. Development on Grade 2 or Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location slightly coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.29.8 SA Objective 8: Waste

Table B.29.8: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.29.9 SA Objective 9: Housing

Table B.29.9: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.29.10 SA Objective 10: Health

Table B.29.10: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
-	AQMA	A/M	Coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle networks. A minor positive impact on the health and wellbeing is expected.

B.29.11 SA Objective 11: Accessibility

Table B.29.11: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
++	Railway Station	-	Majority of the BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
	Connectivity	-	Data not available.
-	Food stores	M	A large proportion is located outside of the sustainable target distance to these facilities. A minor negative impact on access to food stores could be expected. <i>Mitigation: Potential for food stores to be included within the site layout.</i>

B.29.12 SA Objective 12: Education

Table B.29.12: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Shottery St Andrew's C of E Primary School' and 'Bishopton Primary School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	The Broad Location is within the sustainable target distance to 'Stratford-upon-Avon School'. A minor positive impact on access to secondary educational facilities would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.29.13 SA Objective 13: Economy

Table B.29.13: The assessment of Broad Location at 'Stratford-upon-Avon Southwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	STRATFORD-UPON-AVON SOUTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Stratford-upon-Avon.

B.30 Warwick Northeast

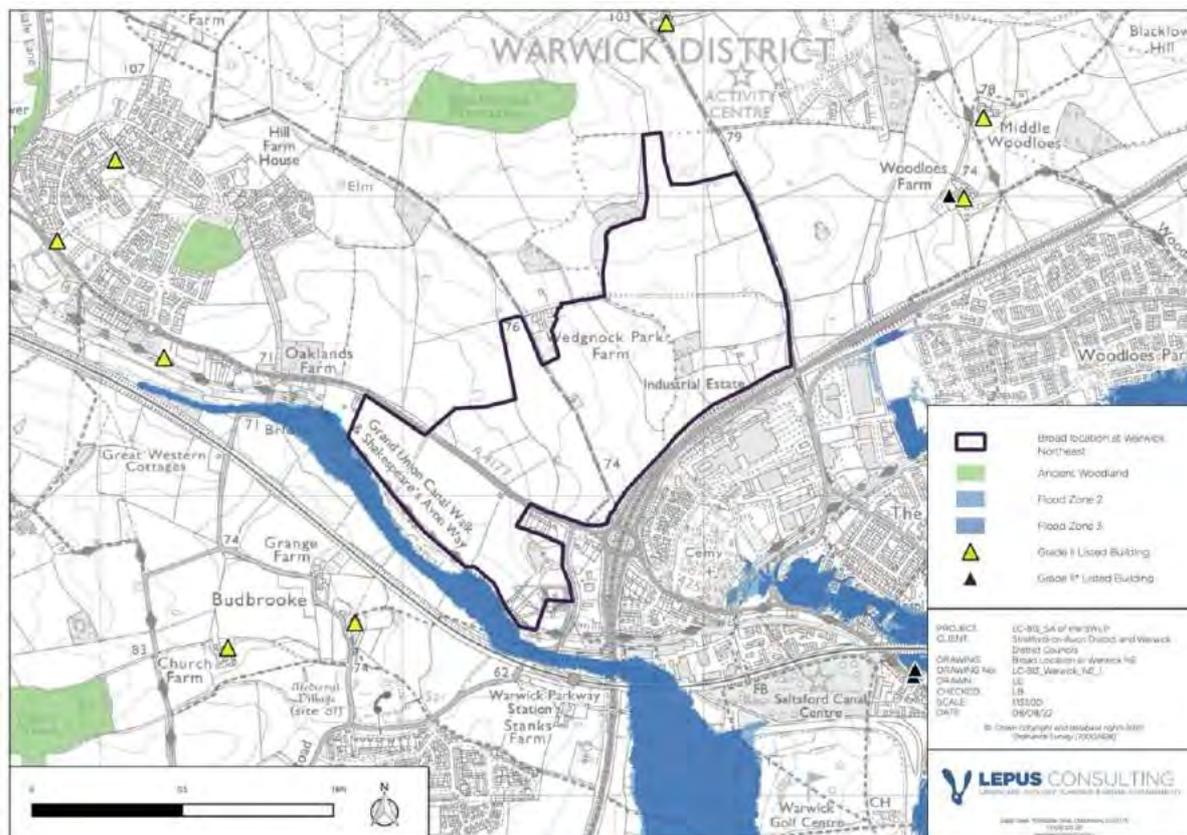


Figure B.30.1: Broad Location at 'Warwick Northeast' with selected constraints

B.30.1 SA Objective 1: Climate Change

Table B.30.1: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.30.2 SA Objective 2: Flood Risk

Table B.30.2: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.

Score	SA2: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.30.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.30.3: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 24.5km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs. As such a negligible impact has been identified.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	Located approximately 250m 'Blackbrake Plantation' ancient woodland. A minor negative impact on this woodland could be expected. <i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	Coincides with 'River Avon and Tributaries' and 'Budbrooke House Meadow'. Adjacent to 'Grand Union Canal' and 'Budbrooke Farm Woodlands and Black Brake Plantation' LWSs. The development of this Broad Location could result in a minor negative impact on LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	Does not coincide with any LGSs.
-	Priority Habitats	A/M	Coincides with deciduous woodland priority habitat. A minor negative impact on biodiversity could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

B.30.4 SA Objective 4: Landscape

Table B.30.4: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 20.3km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Located within Arden Character Area. Appears to be principally part of the sub-type Arden Parklands which has a gently rolling landscape with woodland edges and belts of trees. The Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. The Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>

Score	SA4: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with a PRow footpath. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.30.5 SA Objective 5: Cultural Heritage

Table B.30.5: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	M	Located approximately 365m from Grade II Listed Building 'Prospect Farmhouse'. A minor negative impact on the setting of this heritage asset could be expected. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Listed Building.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	Not located in proximity to any Conservation Area.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.30.6 SA Objective 6: Pollution

Table B.30.6: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A4177 and adjacent to the A46. A minor negative impact on air and noise pollution would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	A railway runs to the south of the Broad Location, approximately 110m away. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality.</i>

Score	SA6: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
-	Watercourses	M	Located adjacent to the 'Grand Union Canal, Warwick to Solihull' watercourse. A minor negative impact on this watercourse could be expected as a result of development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

B.30.7 SA Objective 7: Natural Resources

Table B.30.7: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
--	ALC Grade	M/X	Located wholly upon ALC Grade 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.30.8 SA Objective 8: Waste

Table B.30.8: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.30.9 SA Objective 9: Housing

Table B.30.9: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.30.10 SA Objective 10: Health

Table B.30.10: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
++	NHS Hospital with A&E Department	-	The Broad Location is entirely within the target distance to an NHS hospital with A&E department. A major positive impact on access to healthcare would be expected.
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
-	Access to Leisure Facilities	M	Located wholly outside the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A4177 and adjacent to the A46. A minor negative impact on health would be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle path networks. A minor positive impact on the health and wellbeing is expected.

B.30.11 SA Objective 11: Accessibility

Table B.30.11: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
++	Railway Station	-	Majority of the BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
	Connectivity	-	Data not available.
-	Food stores	M	Majority of Broad Location located outside of the sustainable target distance to a food store. A minor negative impact on access to food stores would be expected. <i>Mitigation: Potential for local services to be included within the site layout.</i>

B.30.12 SA Objective 12: Education

Table B.30.12: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Budbrooke Primary School'. A minor positive impact on access to primary educational facilities would be expected.

Score	SA12: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
-	Access to Secondary School	M	The Broad Location is situated outside of the target distance to a secondary school. A minor negative impact on access to education is expected. <i>Mitigation: Improvements to public transport and active travel networks may provide enhanced access to these facilities. Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.30.13 SA Objective 13: Economy

Table B.30.13: The assessment of Broad Location at 'Warwick Northeast' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WARWICK NORTHEAST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.31 Warwick Northwest

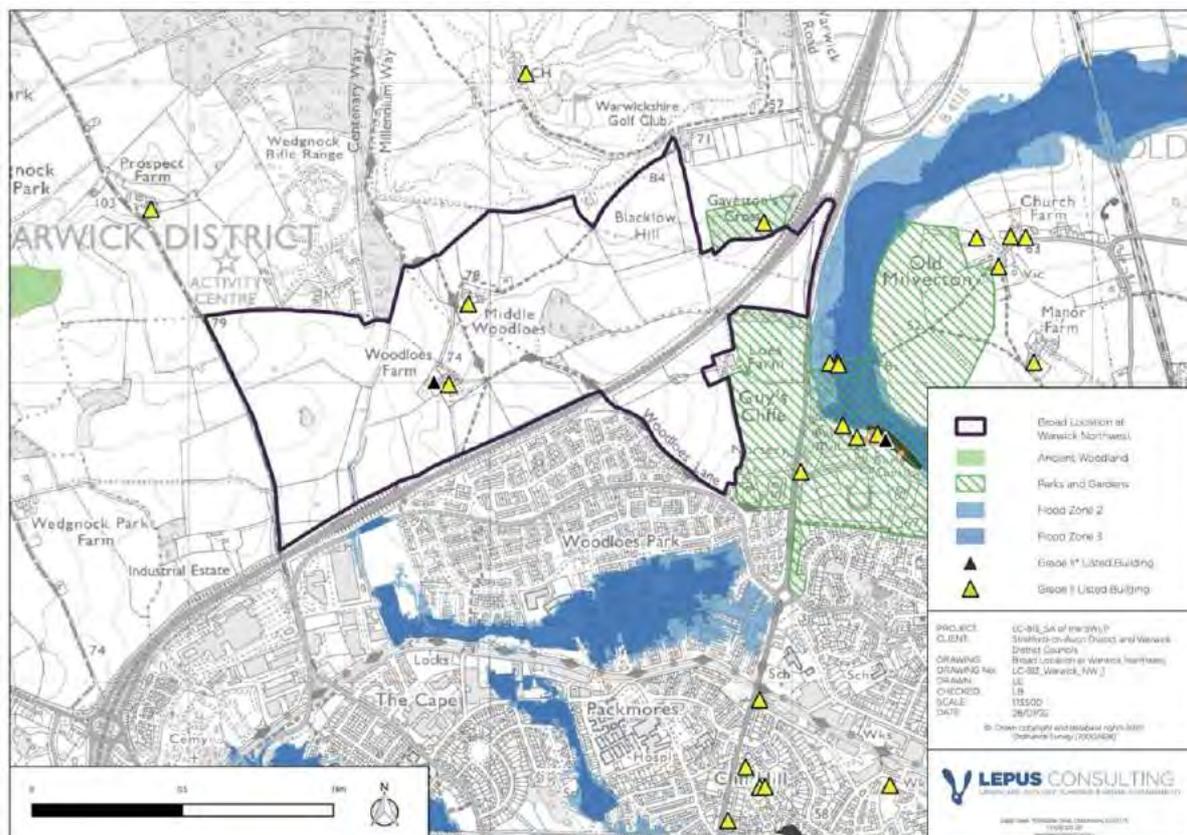


Figure B.31.1: Broad Location at ‘Warwick Northwest’ with selected constraints

B.31.1 SA Objective 1: Climate Change

Table B.31.1: The assessment of Broad Location at ‘Warwick Northwest’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.31.2 SA Objective 2: Flood Risk

Table B.31.2: The assessment of Broad Location at ‘Warwick Northwest’ against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.

Score	SA2: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.31.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.31.3: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
+/-	Habitats Sites	A	The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 23.3km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA process.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There is no ancient woodland in close proximity to the location.
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	Adjacent to 'Wedgenock Rifle Range' and 'Woodloes Farm' LWSs. Coincides with 'River Avon and Tributaries' LWS. The development of this Broad Location could result in a minor negative impact on LWSs. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGS	-	Does not coincide with any LGSs.
-	Priority Habitats	A/M	Coincides with deciduous woodland priority habitat. A minor negative impact on biodiversity could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

B.31.4 SA Objective 4: Landscape

Table B.31.4: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 20.1km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area. Appears to be principally part of the sub-type Wooded Estatelands. The Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.

Score	SA4: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence of settlements.

B.31.5 SA Objective 5: Cultural Heritage

Table B.31.5: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
--	Grade II* Listed Building	A/M	Coincides with 'Woodloes Farmhouse'. A major negative impact on the setting of this Grade II* Listed Building could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate, if possible, through landscape led site design and further heritage assessments to help conserve and enhance the setting of this Listed Building.</i>
--	Grade II Listed Building	A/M	Coincides with Grade II Listed Buildings 'South Barn, Woodloes Farm' and 'Loes Grange'. A major negative impact on the settings of this heritage asset could be expected. Also located approximately 50m from Grade II Listed Building 'Gaveston's Cross', which would induce a minor negative impact on this Listed Building. <i>Mitigation: Avoid impacts through the location and layout of future proposals. Mitigate, if possible, through landscape led site design and further heritage assessments to help conserve and enhance the setting of these Listed Buildings.</i>
--	Registered Parks and Gardens	A/M	BL is adjacent to 'Guys Cliffe' RPG. A major negative impact on the setting of this RPG could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals and or mitigate via landscape led site design and further heritage assessments to help conserve and enhance the setting of this RPG.</i>
0	Conservation Area	-	Not located in proximity to any Conservation Area.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.31.6 SA Objective 6: Pollution

Table B.31.6: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A46 and located adjacent to the A429. A minor negative impact on air and noise pollution could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	There are no railway lines in close proximity to the Broad Location.

Score	SA6: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
-	Watercourses	M	Located approximately 60m from the River Avon. A minor negative impact on this watercourse would be expected following development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a groundwater SPZ.

B.31.7 SA Objective 7: Natural Resources

Table B.31.7: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
--	ALC Grade	M/X	Located wholly upon ALC Grade 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.31.8 SA Objective 8: Waste

Table B.31.8: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.31.9 SA Objective 9: Housing

Table B.31.9: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.31.10 SA Objective 10: Health

Table B.31.10: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
++	NHS Hospital with A&E Department	-	The Broad Location is entirely within the target distance to an NHS hospital with A&E department. A major positive impact on access to healthcare would be expected.
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
-	Access to Leisure Facilities	M	Located wholly outside the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A4177 and adjacent to the A46. A minor negative impact on health could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow network with partial connectivity to the cycle path network. A minor positive impact on the health and wellbeing is expected.

B.31.11 SA Objective 11: Accessibility

Table B.31.11: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
++	Railway Station	-	Majority of the BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
-	Connectivity	M	Located within an area identified as having poor connectivity to the existing settlement (Grade D). A minor negative impact on transport and connectivity could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores could be expected. <i>Mitigation: Potential for local services to be included within the site layout.</i>

B.31.12 SA Objective 12: Education

Table B.31.12: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Woodloes Primary School' and 'All Saints C of E Academy'. A minor positive impact on access to primary educational facilities would be expected.
-	Access to Secondary School	M	The Broad Location is situated outside of the target distance to a secondary school. A minor negative impact on access to education is expected. <i>Mitigation: Improvements to public transport and active travel networks may provide enhanced access to these facilities. Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.31.13 SA Objective 13: Economy

Table B.31.13: The assessment of Broad Location at 'Warwick Northwest' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WARWICK NORTHWEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.32 Warwick West

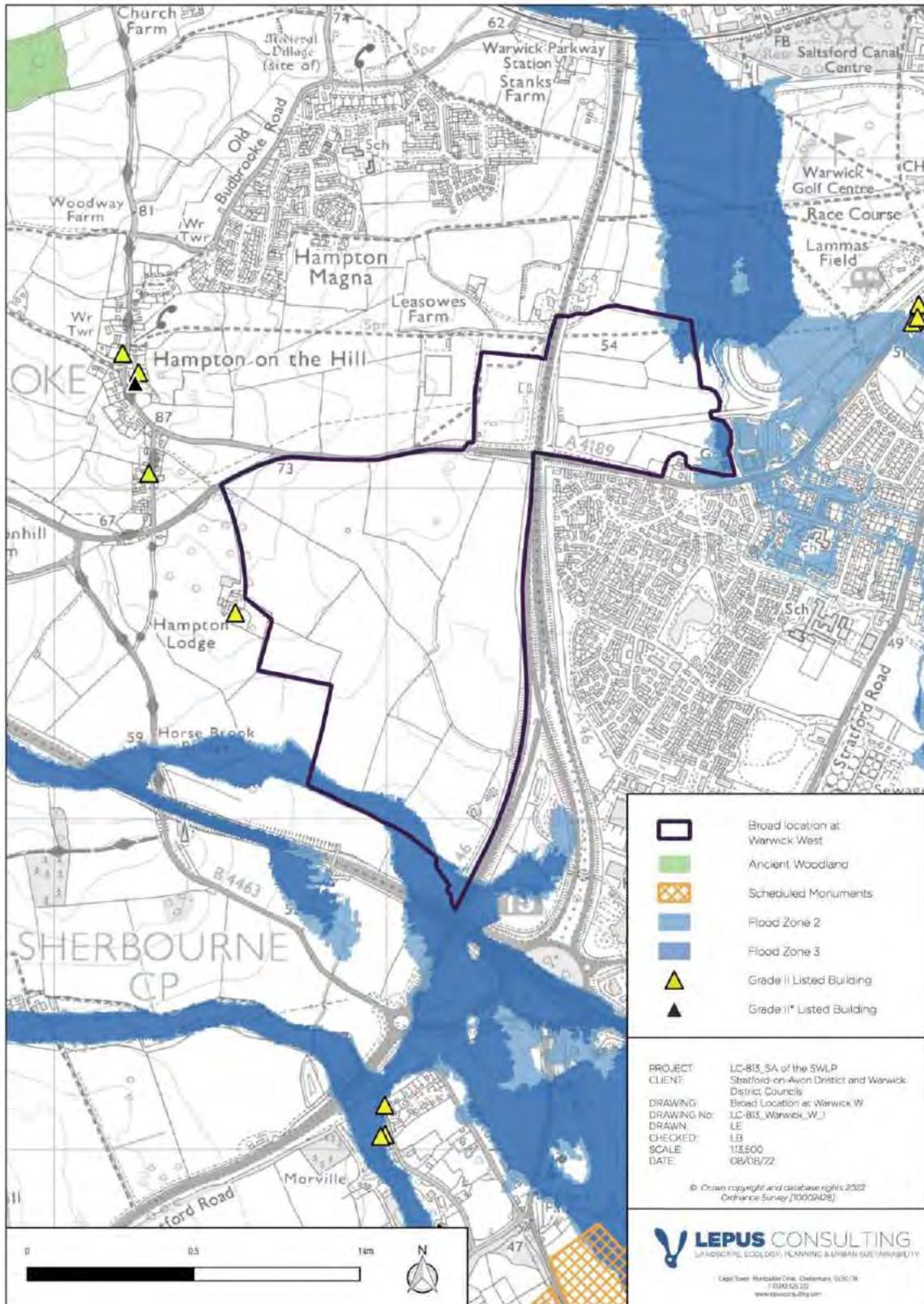


Figure B.32.1: Broad Location at 'Warwick West' with selected constraints

B.32.1 SA Objective 1: Climate Change

Table B.32.1: The assessment of Broad Location at 'Warwick West' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WARWICK WEST: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes.</i></p>

B.32.2 SA Objective 2: Flood Risk

Table B.32.2: The assessment of Broad Location at 'Warwick West' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WARWICK WEST: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.
0	Surface Water Flood Risk	-	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.

B.32.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.32.3: The assessment of Broad Location at 'Warwick West' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WARWICK WEST: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 27km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs located in close proximity to the location.
-	LWSs	A	<p>Coincides with 'River Avon and Tributaries' LWS.. The development of this Broad Location could result in a minor negative impact on the LWS.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	Does not coincide with any LGSs.
-	Priority Habitats	A/M	<p>Coincides with deciduous woodland priority habitat. A minor negative impact on biodiversity could be expected.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i></p>

B.32.4 SA Objective 4: Landscape

Table B.32.4: The assessment of Broad Location at 'Warwick West' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WARWICK WEST: Description of effect
0	National Landscapes/AONBs	-	Located approximately 18.2km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Arden Character Area, sub-type Wooded Estatelands. This a historic landscape with wooded rolling landscape and prominent woodlands on the higher ground. A small area of the landscape could be enhanced according to 1993 guidelines. The Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	This Broad Location could potentially lead to coalescence between the settlements of Warwick and Hampton on the Hill. A minor negative impact on landscape could be expected. <i>Mitigation: Mitigate through incorporation of greenspaces and other undeveloped areas into site design and through use of landscape-led site design practices.</i>

B.32.5 SA Objective 5: Cultural Heritage

Table B.32.5: The assessment of Broad Location at 'Warwick West' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WARWICK WEST: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
-	Grade II Listed Building	M	Located approximately 55m from 'Hampton Lodge' and also within close proximity to 'The Old House'. A minor negative impact on the setting of this Grade II Listed Building would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this Listed Building.</i>
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
-	Conservation Area	M	Located adjacent to 'Warwick' CA. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. <i>Mitigation: Landscape led site design and further heritage assessments to help conserve and enhance the setting of this CA.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.32.6 SA Objective 6: Pollution

Table B.32.6: The assessment of Broad Location at 'Warwick West' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WARWICK WEST: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A46 and A4189 and located adjacent to the M40. A minor negative impact on air and noise pollution would be expected as a result of development at the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Railway Line	-	There are no railway lines in close proximity to the Broad Location.
-	Watercourses	M	Adjacent to 'Horse Brook' and 'Gog Brook'. A minor negative impact on these watercourses would be expected following development at the Broad Location. <i>Mitigation: Appropriate management of construction and implementation of design measures to prevent pollution of the watercourse.</i>
0	Groundwater SPZ	-	Not located within a groundwater SPZ.

B.32.7 SA Objective 7: Natural Resources

Table B.32.7: The assessment of Broad Location at 'Warwick West' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WARWICK WEST: Description of effect
--	ALC Grade	M/X	Located wholly upon ALC Grade 3 land. The potential development at this Broad Location could have a major negative impact on natural resources due to the irreversible loss of this important natural resource. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as a large proportion of the location coincides with an MSA. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.32.8 SA Objective 8: Waste

Table B.32.8: The assessment of Broad Location at 'Warwick West' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WARWICK WEST: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.32.9 SA Objective 9: Housing

Table B.32.9: The assessment of Broad Location at 'Warwick West' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WARWICK WEST: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.32.10 SA Objective 10: Health

Table B.32.10: The assessment of Broad Location at 'Warwick West' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WARWICK WEST: Description of effect
++	NHS Hospital with A&E Department	-	The Broad Location is entirely within the target distance to an NHS hospital with A&E department. A major positive impact on access to healthcare would be expected.
+	Access to GP Surgery	-	The Broad Location is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the Broad Location.
-	Access to Leisure Facilities	M	Located wholly outside the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
-	Main Road	A/M	Coincides with the A46 and A4189 and located adjacent to the M40. A minor negative impact on health could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path	-	Located within target distance to the PRow and cycle path networks. A minor positive impact on the health and wellbeing is expected.

B.32.11 SA Objective 11: Accessibility

Table B.32.11: The assessment of Broad Location at 'Warwick West' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WARWICK WEST: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
++	Railway Station	-	Majority of the BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
--	Connectivity	M	Located within an area identified as having very poor connectivity to the existing settlement (Grade E). A major negative impact on transport and connectivity could be expected. The Broad Location is also within an area of poor connectivity (Grade D).

Score	SA11: Receptor	Mitigation potential	WARWICK WEST: Description of effect
			<i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor negative impact on access to food stores would be expected.

B.32.12 SA Objective 12: Education

Table B.32.12: The assessment of Broad Location at 'Warwick West' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WARWICK WEST: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Newburgh Primary School' and 'Budbrooke Primary School'. A minor positive impact on access to primary educational facilities would be expected.
-	Access to Secondary School	M	Location wholly outside of the target distance to a secondary school. A minor negative impact on access to education is expected. <i>Mitigation: Improvements to public transport may provide enhanced access to these facilities. Potential for secondary education provisions within the Broad Location layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.32.13 SA Objective 13: Economy

Table B.32.13: The assessment of Broad Location at 'Warwick West' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WARWICK WEST: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	The Broad Location is located within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

B.33 Whitnash

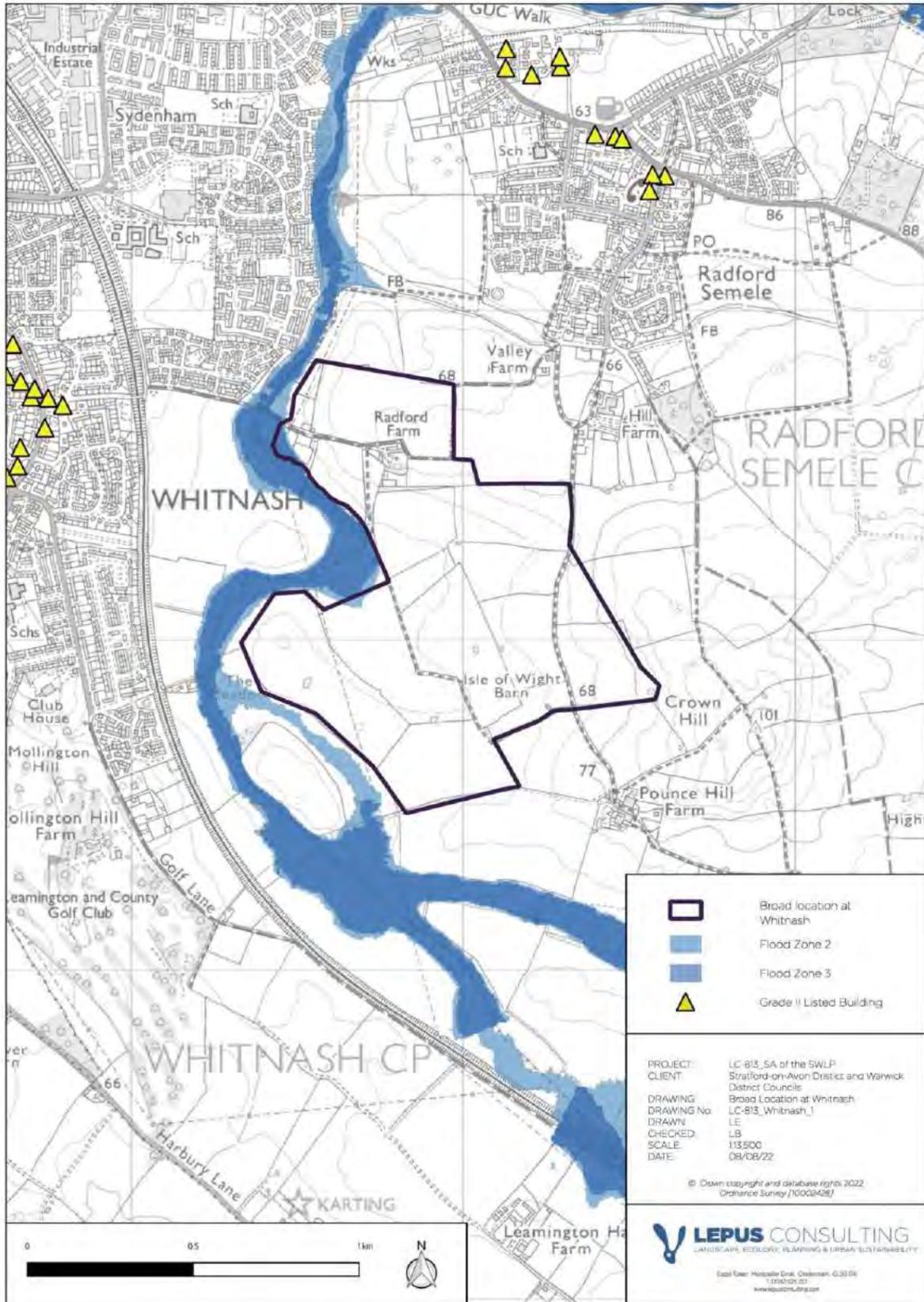


Figure B.33.1: Broad Location at 'Whitnash' with selected constraints

B.33.1 SA Objective 1: Climate Change

Table B.33.1: The assessment of Broad Location at 'Whitnash' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WHITNASH: Description of effect
--	Potential Increase in Carbon Footprint	M/C	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver approximately 1,800 or more dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The Broad Locations have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs. Future policies will seek to reduce the GHG emissions associated with the construction and operation of homes. The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

B.33.2 SA Objective 2: Flood Risk

Table B.33.2: The assessment of Broad Location at 'Whitnash' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WHITNASH: Description of effect
+	Riparian Flood Zones	-	The Broad Location has less than 1% of the area within Flood Zones 2 and/or 3. A minor positive impact on risk from riparian flooding would be expected.
+	Surface Water Flood Risk	-	The Broad Location is almost entirely located in areas which are not at risk of surface water flooding. A minor positive impact on risk from surface water flooding would be expected.

B.33.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table B.33.3: The assessment of Broad Location at 'Whitnash' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WHITNASH: Description of effect
+/-	Habitats Sites	A	<p>The nearest Habitats Site is 'Ensor's Pool' SAC located approximately 26km northeast of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA process.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
-	LNRs	A	<p>A minor negative impact on LNRs could be expected as 'Whitnash Brook' LNR is located approximately 40m from the Broad Location.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
--	LWSs	A	<p>A major negative impact on 'Whitnash Brook' and 'Whitnash Brook South' LWSs could be expected as they coincide with the Broad Location.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGS	-	The Broad Location does not coincide with any LGSs.

Score	SA3: Receptor	Mitigation potential	WHITNASH: Description of effect
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'coastal and floodplain grazing marsh'. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

B.33.4 SA Objective 4: Landscape

Table B.33.4: The assessment of Broad Location at 'Whitnash' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WHITNASH: Description of effect
0	National Landscapes/AONBs	-	Located approximately 14km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	Located within Feldon Character Area. This is a lowland agricultural region with Tudor and Parliamentary enclosure fields. The Vale Farmlands local character area within which the BL sits could be enhanced. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
	Landscape Sensitivity		Information not available.
0	Special Landscape Areas	-	Location does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This Broad Location is unlikely to lead to coalescence between settlements.

B.33.5 SA Objective 5: Cultural Heritage

Table B.33.5: The assessment of Broad Location at 'Whitnash' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WHITNASH: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
0	Grade II Listed Building	-	Not located in proximity to any Grade II Listed Buildings.
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monument.

B.33.6 SA Objective 6: Pollution

Table B.33.6: The assessment of Broad Location at 'Whitnash' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WHITNASH: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	There are no railway lines in close proximity to the Broad Location.
-	Watercourses	M	Radford Brook slightly coincides with the Broad Location. A minor negative impact on this watercourse would be expected following development at the Broad Location. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>
0	Groundwater SPZ	-	Not located within a groundwater SPZ.

B.33.7 SA Objective 7: Natural Resources

Table B.33.7: The assessment of Broad Location at 'Whitnash' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WHITNASH: Description of effect
--	ALC Grade	M/X	The Broad Location is wholly situated on ALC Grade 3 land. Development on Grade 3a land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources could be expected as the Broad Location coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

B.33.8 SA Objective 8: Waste

Table B.33.8: The assessment of Broad Location at 'Whitnash' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WHITNASH: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

B.33.9 SA Objective 9: Housing

Table B.33.9: The assessment of Broad Location at 'Whitnash' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WHITNASH: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 1,800 dwellings would be expected to make a significant contribution towards

Score	SA9: Receptor	Mitigation potential	WHITNASH: Description of effect
			meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.33.10 SA Objective 10: Health

Table B.33.10: The assessment of Broad Location at 'Whitnash' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WHITNASH: Description of effect
-	NHS Hospital with A&E Department	M	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	A minor positive impact would be expected as the Broad Location is located within the target distance to a GP Surgery.
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the Broad Location is located outside of the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure facilities.</i>
0	AQMA	-	The Broad Location is not within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
+	Access to Greenspace	-	Located partially within of the target distance to one or more greenspaces. A minor positive effect on health would be expected. <i>Mitigation: negative impacts can be mitigated by the provision of greenspace within the layout and design of the Broad Location.</i>
+	Access to PRoW / Cycle Path	-	Located within target distance to the PRoW network, with no current connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.

B.33.11 SA Objective 11: Accessibility

Table B.33.11: The assessment of Broad Location at 'Whitnash' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WHITNASH: Description of effect
+	Bus Stop	-	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.
-	Railway Station	M	The Broad Location is situated outside of the sustainable target distance to a railway station. A minor negative impact on site end users' access to rail services is expected. <i>Mitigation: Public transport improvement schemes.</i>
	Connectivity	-	Data not available.
+	Food stores	-	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.

B.33.12 SA Objective 12: Education

Table B.33.12: The assessment of Broad Location at 'Whitnash' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WHITNASH: Description of effect
+	Access to Primary School	-	The Broad Location is within the sustainable target distance to 'Briar Hill Infant School' and 'St Margaret's C of E Junior School'. A minor positive impact on access to primary educational facilities would be expected.
+	Access to Secondary School	-	A minor positive impact would be expected the Broad Location is within the sustainable target distance from the secondary school 'Campion School'.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to further educational facilities would be expected.

B.33.13 SA Objective 13: Economy

Table B.33.13: The assessment of Broad Location at 'Whitnash' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WHITNASH: Description of effect
+/-	Employment Floorspace Provision	-	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Stratford-upon-Avon.

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Appendix C: Sustainability Appraisal of small settlement locations

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C.1 Barford

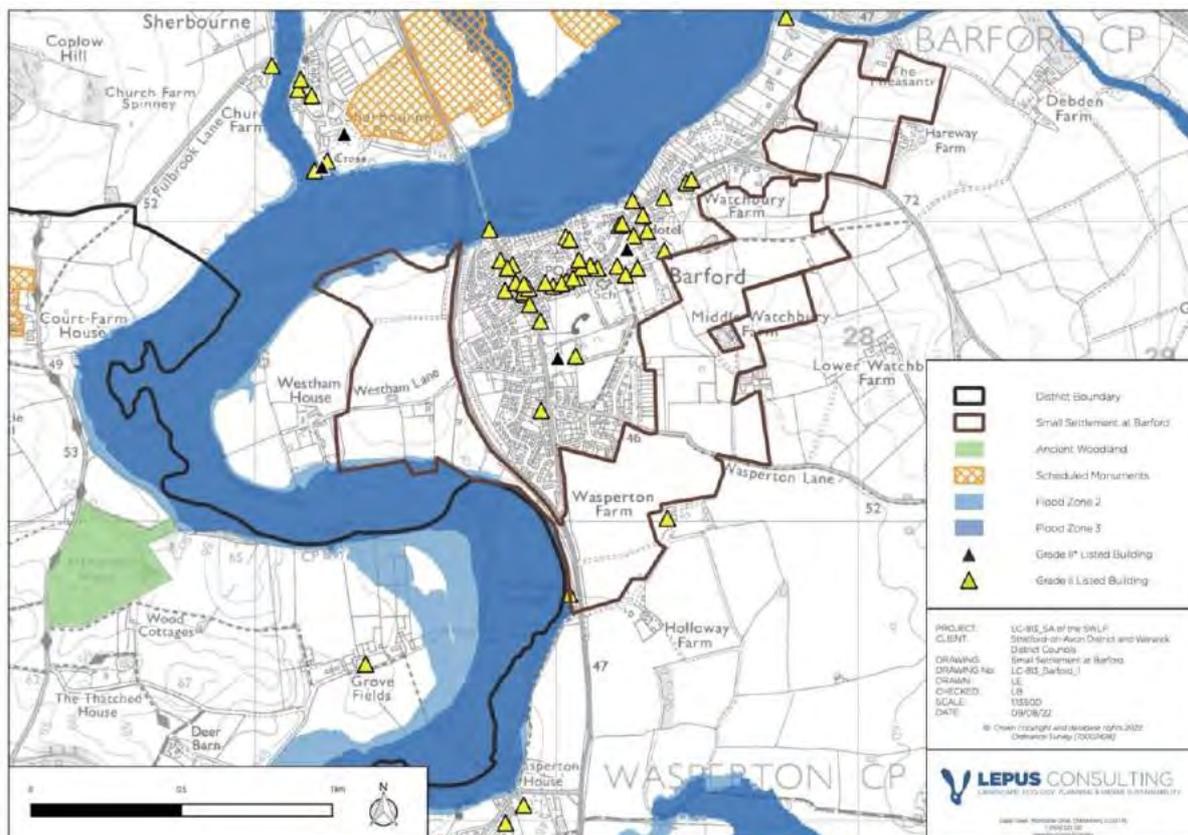


Figure C.1.1: Small settlement at Barford with selected constraints

C.1.1 SA Objective 1: Climate Change

Table C.1.1: The assessment of the small settlement location at ‘Barford’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	BARFORD: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.1.2 SA Objective 2: Flood Risk

Table C.1.2: The assessment of the small settlement location at 'Barford' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	BARFORD: Description of effect
0	Flood Zones	A/M	The majority of land surrounding Barford lies in Flood Zone 1, which has the lowest risk of fluvial flooding. This includes the majority of this small settlement location. A narrow strip of land around the north western and south western boundaries lies within Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through design to avoid Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.1.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.1.3: The assessment of Small Settlement at 'Barford' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	BARFORD: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in close proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'River Avon and Tributaries' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	One priority habitat type is located in the area of search 'traditional orchard'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.1.4 SA Objective 4: Landscape

Table C.1.4: The assessment of the small settlement location at 'Barford' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	BARFORD: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 15.6km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the Cotswold AONB.
-	Landscape Character	M	This small settlement location is situated in two Character Areas, the Avon Valley and the Feldon Character Areas. Within the Avon Valley Character Area the small settlement location sits predominantly within the Terrace Farmlands local character area (characterised by an open, hedged agricultural landscape) with a small area close to the River Avon within the River Meadowlands local character area (characterised by a narrow, meandering river corridor with flood meadows and steep wooded river bluffs). Within the Feldon Character Area the small settlement location is situated in the Feldon Parkland local character area, which is characterised by wooded estate landscape and large country houses set in mature parkland. The small settlement location could be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This location coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.1.5 SA Objective 5: Cultural Heritage

Table C.1.5: The assessment of the small settlement location at 'Barford' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	BARFORD: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
-	Grade II* Listed Building	A/M	There are two listed buildings in proximity of the area of search. Grade II* listed buildings are 'Church of St Peter' and 'Barford House'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>

Score	SA5: Receptor	Mitigation potential	BARFORD: Description of effect
-	Grade II Listed Building	A/M	Coincides with part of a Grade II Listed Building 'The Forge Cottage', which lies on the south western boundary of the small settlement location. It is also in close proximity to / can be seen from a number of Grade II Listed Buildings, including 'Barford Lodge' and 'Wasperton Farmhouse'. A minor negative impact could therefore be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to any RPG.
0	Conservation Area	-	Not in close proximity to any Conservation Area
-	Scheduled Monument		The Scheduled Monument 'Enclosures in Sherbourne House' lies approximately 372m to the north of the small settlement location and can be viewed across the floodplain of the River Avon. A minor negative impact on setting is therefore possible. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>

C.1.6 SA Objective 6: Pollution

Table C.1.6: The assessment of the small settlement location at 'Barford' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	BARFORD: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A429 runs in a north to south direction through this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The River Avon flows along the western and northern boundaries of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.1.7 SA Objective 7: Natural Resources

Table C.1.7: The assessment of the small settlement location at 'Barford' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	BARFORD: Description of effect
--	Agricultural Land Classification	M/X	A large proportion of this small settlement location is located on ALC Grade 3 land, and smaller proportion of the location situated on ALC Grade 2, with the far northern area within

Score	SA7: Receptor	Mitigation potential	BARFORD: Description of effect
			<p>ALC Grade 4. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils.</p> <p><i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i></p>
-	Mineral Safeguarding Area	M/X	<p>The whole small settlement location is situated within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected.</p> <p><i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i></p>

C.1.8 SA Objective 8: Waste

Table C.1.8: The assessment of the small settlement location at 'Barford' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	BARFORD: Description of effect
-	Potential increase in household waste generation	M	<p>Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development of this small settlement location.</p> <p><i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i></p>

C.1.9 SA Objective 9: Housing

Table C.1.9: The assessment of the small settlement location at 'Barford' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	BARFORD: Description of effect
++	Housing provision	-	<p>For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.</p>

C.1.10 SA Objective 10: Health

Table C.1.10: The assessment of the small settlement location at 'Barford' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	BARFORD: Description of effect
+	NHS Hospital with A&E Department	-	<p>Location is partially in the sustainable target distance to the closest NHS hospital with an A&E department, which is 'Warwick Hospital'. A minor positive impact would be expected.</p>
-	Access to GP Surgery	M	<p>A minor negative impact would be expected as this small settlement location is situated outside of the target distance to GP Surgery.</p>

Score	SA10: Receptor	Mitigation potential	BARFORD: Description of effect
			<i>Mitigation: Potential for improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	This small settlement location is located 3.6km south of 'St Nicholas Park Leisure Centre'. Outside of the target distance. <i>Mitigation: Potential for provision improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	-	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A429 runs in a north to south direction through this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	The majority of this small settlement location is situated within target distance to a PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

C.1.11 SA Objective 11: Accessibility

Table C.1.11: The assessment of the small settlement location at 'Barford' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	BARFORD: Description of effect
+	Bus Stop	-	A minor positive impact could be expected. Small settlement location is partially located within the target distance to a bus stop providing regular services.
-	Railway Station	M	A minor negative impact could be expected as the entirety of this small settlement location is situated outside the target distance of a train station providing regular services. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>
-	Connectivity	M	Connectivity around Barford varies. Some areas to the north-east and east are identified as having good connectivity (Grade B). Other areas, particularly to the south-west are identified as lacking in connectivity to the village centre (Grade D). Without mitigation, development in less accessible areas may lead to a minor negative impact on transport and access. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Local Services	-	A large proportion of this small settlement location is situated within the sustainable target distance to local services. A minor positive impact would be expected.

C.1.12 SA Objective 12: Education

Table C.1.12: The assessment of the small settlement location at 'Barford' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	BARFORD: Description of effect
+	Access to Primary School	-	The majority of this small settlement location is situated within 800m of a primary school.

Score	SA12: Receptor	Mitigation potential	BARFORD: Description of effect
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of any secondary schools. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	The entirety of this small settlement location is situated within the target distance of an area that offers further education.

C.1.13 SA Objective 13: Economy

Table C.1.13: The assessment of the small settlement location at 'Barford' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	BARFORD: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within 'Tournament Fields Business Park'. A minor positive impact on the local economy could be expected.

C.2 Bearley

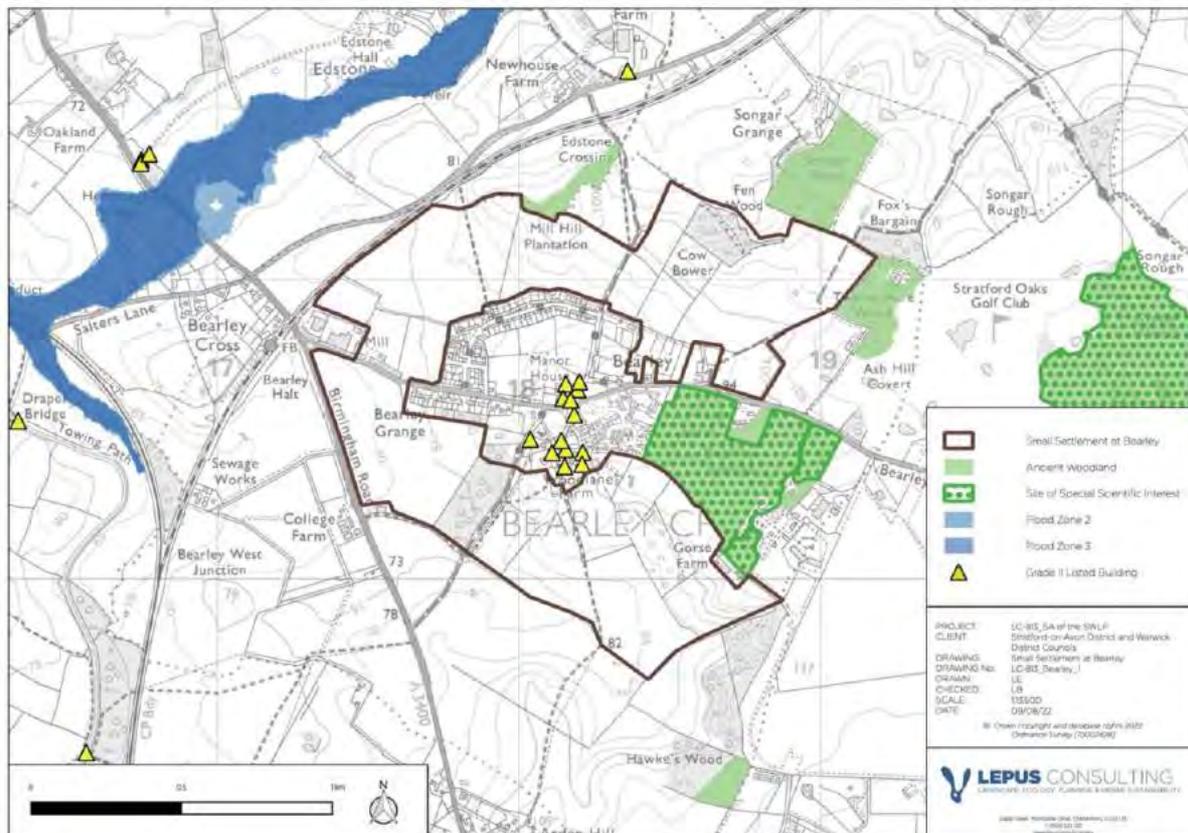


Figure C.2.1: Small settlement at Bearley with selected constraints

C.2.1 SA Objective 1: Climate Change

Table C.2.1: The assessment of the small settlement location at ‘Bearley’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	BEARLEY: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.2.2 SA Objective 2: Flood Risk

Table C.2.2: The assessment of the small settlement location at 'Bearley' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	BEARLEY: Description of effect
+	Flood Zones	-	This small settlement location sits wholly within Flood Zone 1
0	Surface Water Flood Risk	A/M	There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.2.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.2.3: The assessment of the small settlement location at 'Bearley' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	BEARLEY: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
--	SSSIs	A	Located adjacent to 'Snitterfield and Bearley Bushes' SSSI, designated for its scarce, rich ground flora and entomological interest. The IRZ states "all planning applications – except householder applications must consult Natural England". Without mitigation there is potential for major negative impacts on this SSSI. <i>Mitigation: Avoid impacts through the location and layout of any future development and/or mitigate through appropriate management strategies.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	A minor negative impact could be expected as the ancient woodlands 'Bearley Bushes West', 'Songar Wood' and 'Mill Hill Planation' are located adjacent to the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Meadow', 'River Alne', 'Woodland Strip Near Edstone Crossing', 'Songar and Fen Wood and Cow Bower' and 'Hawkes Wood' LWSs. Development in these locations could have minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'traditional orchard'. There is potential for minor negative impacts on priority habitats.

Score	SA3: Receptor	Mitigation potential	BEARLEY: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.2.4 SA Objective 4: Landscape

Table C.2.4: The assessment of the small settlement location at 'Bearley' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	BEARLEY: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 12.9km from the Cotswolds NL. Development in this location would be unlikely to significantly impact the NL.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Wooded Estates local character area. This is characterised by a wooded estate landscape with large scale rolling topography and prominent hilltop woodlands. The western section of this small settlement location is in an area identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	A large proportion of the site coincides with 'Arden' SLA. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	Small settlement location coincides with various PRoWs. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.2.5 SA Objective 5: Cultural Heritage

Table C.2.5: The assessment of the small settlement location at 'Bearley' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	BEARLEY: Description of effect
0	Grade I Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located in proximity to a Grade II* Listed Building.

Score	SA5: Receptor	Mitigation potential	BEARLEY: Description of effect
-	Grade II Listed Building	A/M	There are a number of Grade II listed buildings around the exterior of this small settlement which can be viewed from the small settlement location. The Grade II listed buildings include, 'The Chimney House', 'Wood Lane Farmhouse', 'Cart Shed at Bearley Manor', 'Barn at Bearley Manor' and 'Bearley Manor and Barn Adjoining'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
-	Conservation Area	-	The area of search lies adjacent to the 'Bearley' CA, with a small part of the area coinciding with the CA. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
0	Scheduled Monument		Not in close proximity to a Scheduled Monument.

C.2.6 SA Objective 6: Pollution

Table C.2.6: The assessment of the small settlement location at 'Bearley' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	BEARLEY: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A3400 runs to the immediate west of this small settlement location. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
-	Railway Line	M	A railway line runs along the north western boundary of this small settlement location. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
0	Watercourse	-	This small settlement location is not located in close proximity to a watercourse.
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.2.7 SA Objective 7: Natural Resources

Table C.2.7: The assessment of the small settlement location at 'Bearley' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	BEARLEY: Description of effect
--	Agricultural Land Classification	M/X	The majority of this location is on ALC Grade 3 land, with the far south eastern section located on ALC Grade 4. Should the Grade 3 land be assessed in the future as Grade

Score	SA7: Receptor	Mitigation potential	BEARLEY: Description of effect
			3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	A small proportion of the north of section of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.2.8 SA Objective 8: Waste

Table C.2.8: The assessment of the small settlement location at 'Bearley' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	BEARLEY: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.2.9 SA Objective 9: Housing

Table C.2.9: The assessment of the small settlement location at 'Bearley' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	BEARLEY: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.2.10 SA Objective 10: Health

Table C.2.10: The assessment of the small settlement location at 'Bearley' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	BEARLEY: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 10.3km north-east. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>

Score	SA10: Receptor	Mitigation potential	BEARLEY: Description of effect
-	Access to GP Surgery	M	A minor negative impact would be expected as this small settlement location is situated outside of the target distance to GP Surgery. <i>Mitigation: Potential for improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	The small settlement location is situated approximately 5km south-east from 'Stratford Leisure Centre'. Therefore, the small settlement location is situated outside of the target distance. <i>Mitigation: Potential for improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on air quality and noise pollution could be expected as the A3400 is located adjacent to the west boundary of this small settlement location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

C.2.11 SA Objective 11: Accessibility

Table C.2.11: The assessment of the small settlement location at 'Bearley' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	BEARLEY: Description of effect
+	Bus Stop	-	A proportion of this small settlement location in the west is situated within the target distance of a regular bus service. A minor positive impact on site end users' access to sustainable transport could be expected.
++	Railway Station	-	A major positive impact could be expected as the majority of this small settlement location is situated within the target distance to a train station providing regular services.
-	Connectivity	M	Connectivity around Bearley varies. Some areas to the to the south are identified as having excellent connectivity (Grade A) with other areas having moderate connectivity (Grade C). Other areas, particularly to the north and north-west are identified as lacking in connectivity to the village centre (Grade D). Without mitigation, development in less accessible areas may lead to a minor negative impact on transport and access. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
-	Local Services	M	A large proportion of this small settlement location is situated outside the sustainable target distance to local services. A minor negative impact on access to local services would be expected. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>

C.2.12 SA Objective 12: Education

Table C.2.12: The assessment of the small settlement location at 'Bearley' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	BEARLEY: Description of effect
-	Access to Primary School	M	A minor negative impact can be expected as the entirety of this location is outside the sustainable target distance of any primary schools. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of any secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	A significant proportion of this small settlement location is situated within the target distance of an area that offers further education.

C.2.13 SA Objective 13: Economy

Table C.2.13: The assessment of the small settlement location at 'Bearley' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	BEARLEY: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within Stratford-upon-Avon. A minor positive impact on the local economy could be expected.

C.3 Bidford

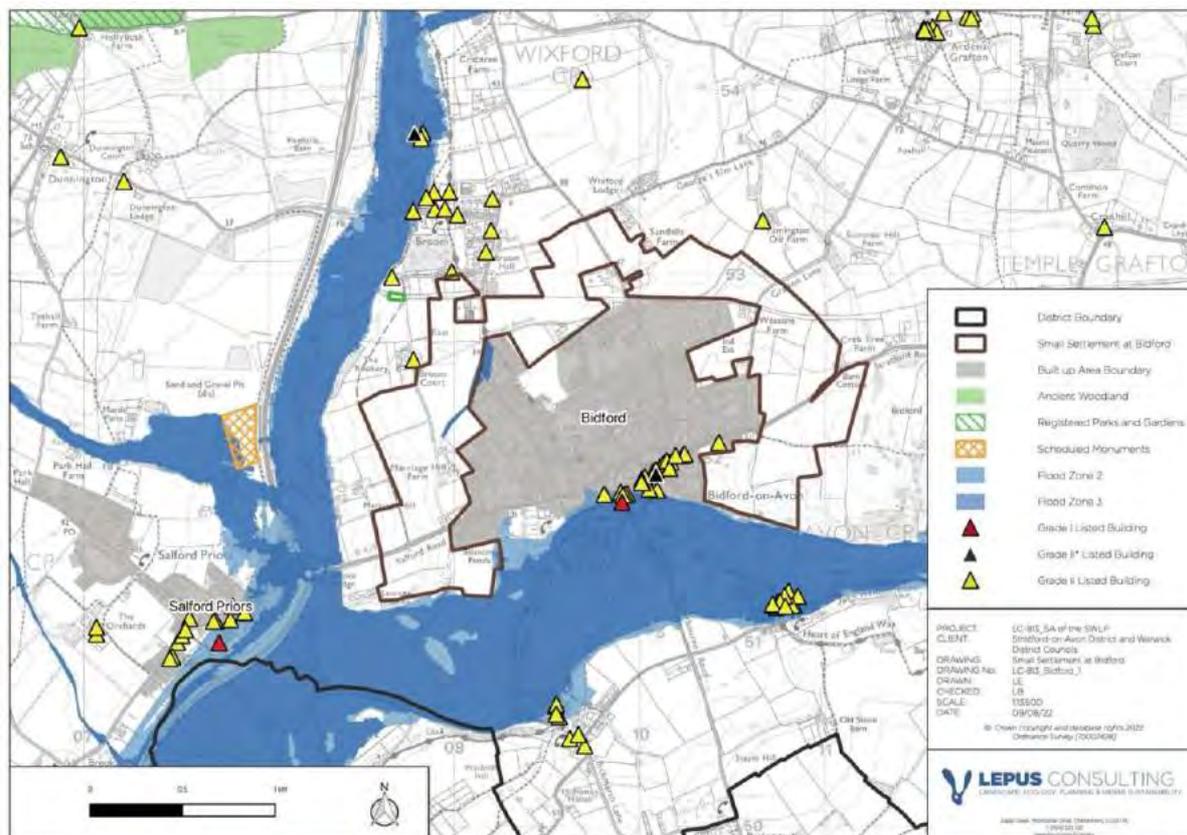


Figure C.3.1: Small settlement at Bidford with selected constraints

C.3.1 SA Objective 1: Climate Change

Table C.3.1: The assessment of the small settlement location at ‘Bidford’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	BIDFORD: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.3.2 SA Objective 2: Flood Risk

Table C.3.2: The assessment of the small settlement location at 'Bidford' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	BIDFORD: Description of effect
0	Flood Zones	A	The small settlement location at Bidford predominantly lies in Flood Zone 1, the lowest risk of fluvial flooding. A very small area along the boundaries of the small settlement location however lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through design to avoid Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	M	There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.3.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.3.3: The assessment of the small settlement location at 'Bidford' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	BIDFORD: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'River Avon and Tributaries', 'Broom Old Quarry' and 'Alcester – Broom Disused Railway' LWSs. Development in these locations could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'traditional orchard'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.3.4 SA Objective 4: Landscape

Table C.3.4: The assessment of the small settlement location at 'Bidford' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	BIDFORD: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 7.8km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Avon Valley Character Area and within three local character areas. Terrace Farmland (characterised by flat, open, intensively farmed landscape with market gardening on fertile river terrace soils), Vale Orchard Belt (characterised by open, rolling, intensively farmed landscape or large, poorly defined fields, orchards and prominent hilltop woodlands) and River Meadows (characterised by a narrow, meandering river corridor landscape with flood meadows and steep wooded river bluffs). The majority of this small settlement location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	A/M	Includes areas of 'high-medium' and 'medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	-	This small settlement location is situated approximately 990m from the 'Arden' SLA and therefore there is potential for minor negative impacts associated with development at this location.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This location coincides with various PRoWs. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development on this Small Settlement could increase the risk of coalescence with 'Broom'. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

C.3.5 SA Objective 5: Cultural Heritage

Table C.3.5: The assessment of small settlement location at 'Bidford' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	BIDFORD: Description of effect
-	Grade I Listed Building	A/M	There is one Grade I Listed building in proximity to the area of search. The listed building is 'Bidford Bridge' which is 440m from the area of search which wraps round the east and west of this feature. There is the potential for minor negative impact on the setting of this heritage asset. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>

Score	SA5: Receptor	Mitigation potential	BIDFORD: Description of effect
0	Grade II* Listed Building	-	Not located in proximity to a Grade II* Listed Building.
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings in within the small settlement of Bidford, however only 'Tower Hill Farmhouse' is visible from the small settlement location being on the edge of the settlement.. There is the potential for minor negative impacts on the setting of this heritage asset. <i>Mitigation: This feature lies outside the Small Settlement. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals. .</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
-	Conservation Area	A/M	The area of small settlement location lies adjacent to the 'Bidford on Avon' CA. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
-	Scheduled Monument	A	The 'Bidford Bridge' SM lies at its closest point approximately 426m from the small settlement location which wraps round to the west and east. There is the potential for development to impact on the setting of this feature. <i>Mitigation: Further information is required to understand the significance of these heritage features and their settings.</i>

C.3.6 SA Objective 6: Pollution

Table C.3.6: The assessment of the small settlement location at 'Bidford' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	BIDFORD: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The River Arrow flows along the western boundary of this location and the River Avon along the southern boundary. There is potential for minor negative impacts on these watercourses from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.3.7 SA Objective 7: Natural Resources

Table C.3.7: The assessment of the small settlement location at 'Bidford' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	BIDFORD: Description of effect
--	Agricultural Land Classification	M/X	A large proportion of this small settlement location is located on ALC Grade 2 land, and a smaller proportion is located on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3

Score	SA7: Receptor	Mitigation potential	BIDFORD: Description of effect
			data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	All of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.3.8 SA Objective 8: Waste

Table C.3.8: The assessment of Small Settlement at 'Bidford' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	BIDFORD: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of the Small Settlement. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.3.9 SA Objective 9: Housing

Table C.3.9: The assessment of the small settlement location at 'Bidford' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	BIDFORD: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.3.10 SA Objective 10: Health

Table C.3.10: The assessment of the small settlement location at 'Bidford' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	BIDFORD: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Alexandra Hospital', approximately 11.8km north of 'Bidford'. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	Located partially within target distance for a GP surgery. A minor positive impact on health and wellbeing is expected.

Score	SA10: Receptor	Mitigation potential	BIDFORD: Description of effect
-	Access to Leisure Facilities	M	This small settlement location is situated approximately 4.4km to the south of the 'Hannah Susan Greig Memorial Hall'. Therefore, it is located outside of the target distance. <i>Mitigation: Potential for improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
+	Main Road	-	Small settlement location located over 200m from a main road.
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to the PRow and cycle network. A minor positive impact on health and wellbeing is expected.

C.3.11 SA Objective 11: Accessibility

Table C.3.11: The assessment of the small settlement location at 'Bidford' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	BIDFORD: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
-	Railway Station	M	A minor negative impact would be expected as the majority of this small settlement location is situated outside the target distance to a train station providing regular services. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>
0	Connectivity	-	Connectivity around Bidford varies. Approximately half of the small settlement location for development is identified as having good connectivity (Grade B). With the other half identified as having moderate connectivity to the village centre (Grade C). A negligible impact on transport and connectivity could be expected overall.
-	Local Services	M	A large proportion of this small settlement location is situated outside the sustainable target distance to local services. A minor negative impact on access to local services would be expected. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>

C.3.12 SA Objective 12: Education

Table C.3.12: The assessment of the small settlement location at 'Bidford' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	BIDFORD: Description of effect
+	Access to Primary School	-	This small settlement location is situated within the sustainable target distance of a primary school.
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of any secondary schools. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Further Education	M	A minor negative impact can be expected as this location is outside the sustainable target distance of any area that offers further education. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.3.13 SA Objective 13: Economy

Table C.3.13: The assessment of the small settlement location at 'Bidford' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	BIDFORD: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

C.4 Bishop’s Tachbrook

Figure C.4.1: Small settlement at Bishop’s Tachbrook with selected constraints

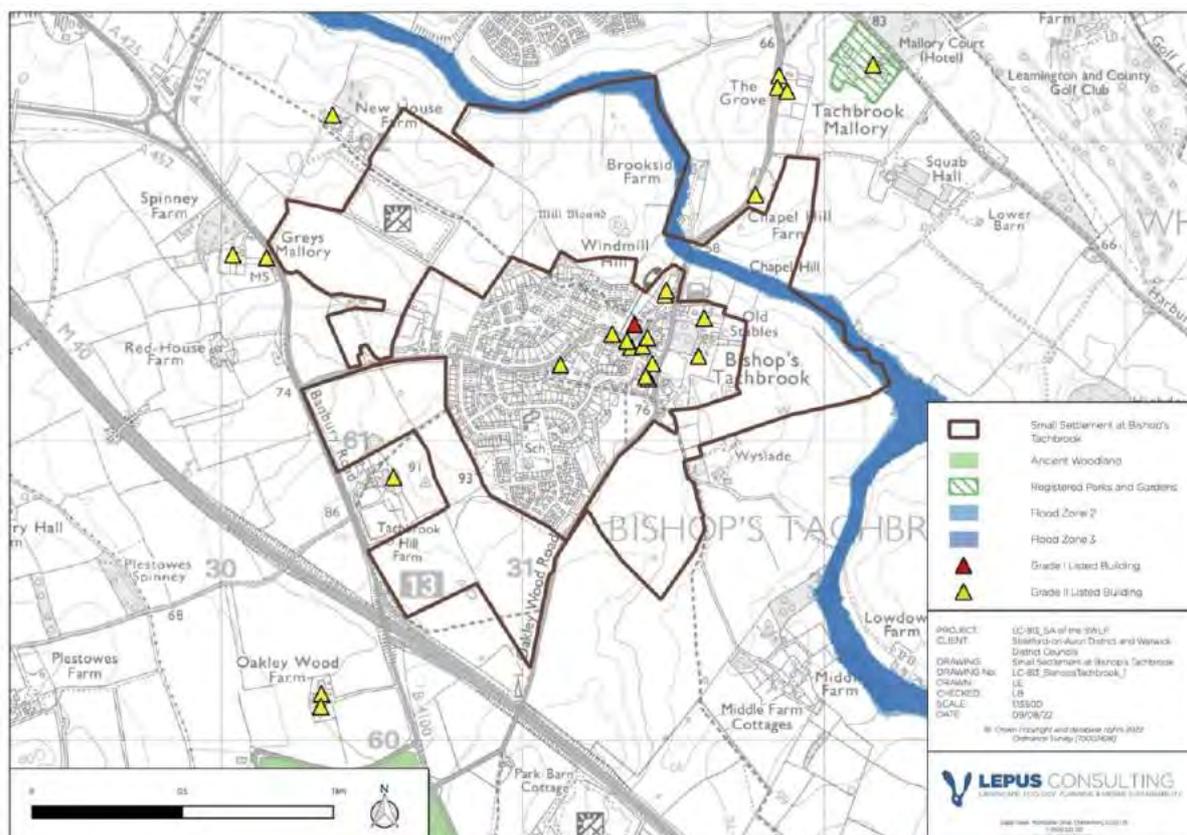


Figure C.4.2: Small settlement at Bishop’s Tachbrook with selected constraints

C.4.1 SA Objective 1: Climate Change

Table C.4.1: The assessment of the small settlement location at ‘Bishop’s Tachbrook’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	BISHOP’S TACHBROOK: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation:</p> <p><i>The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</i></p>

C.4.2 SA Objective 2: Flood Risk

Table C.4.2: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
0	Flood Zones	A/M	The majority of land within the small settlement location at 'Bishop's Tachbrook' lies in Flood Zone 1, the lowest risk of fluvial flooding. A small strip of land within the north eastern section of the proposed location, following the course of the Tach Brook, lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.4.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.4.3: The assessment of Small Settlement at 'Bishop's Tachbrook' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'River Avon and Tributaries' LWS. Development in this location could have a minor negative impacts on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
0	Priority Habitats	-	This small settlement location does not coincide with any priority habitat

C.4.4 SA Objective 4: Landscape

Table C.4.4: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 13.3km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Feldon Character Area and within Feldon Parklands local character area. This is characterised by a well wooded estate landscape with many large country houses set in mature parkland. The small settlement location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This small settlement location coincides with various PRoW. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development on this small settlement location could increase the risk of coalescence with Whitnash and Warwick. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

C.4.5 SA Objective 5: Cultural Heritage

Table C.4.5: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
-	Grade I Listed Building	A/M	There is one Grade I Listed building located within the center of Bishop's Tachbrook. The listed building is 'Church of Saint Chad' which is 106m from the small settlement location which wraps round the small settlement. There is the potential for minor negative impact on the setting of this heritage asset. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
0	Grade II* Listed Building	-	Not located in proximity to a Grade II* Listed Building.

Score	SA5: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings within the center of Bishop's Tachbrook, some which are visible from the small settlement location including '8, Savages Close', 'The Old Manor House', 'Barn 30 yards to north east of Hill Farmhouse', 'Chapel Hill Farmhouse', 'Eden Cottage' and 'The Leopard Public House'. There is the potential for minor negative impacts on the setting of these heritage assets. <i>Mitigation: This feature lies outside the Small Settlement. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals. .</i>
-	Registered Parks and Gardens	A/M	The proposed location is situated in proximity to 'Mallory Court' Register Park and Garden, which is 243m away from the area of search to the north east. There is potential for minor negative impacts on the setting of this RPG. <i>Mitigation: Avoid impacts through the location and layout of future proposals, or the use of landscape-led site design practices.</i>
0	Conservation Area	-	Not in close proximity to a Conservation Area
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.4.6 SA Objective 6: Pollution

Table C.4.6: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected, as the A452 runs along the western boundary of this location. In addition, the M40 runs along the south western corner. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The Tach Brook (a tributary of the River Avon) flows along the northern and eastern boundaries of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.4.7 SA Objective 7: Natural Resources

Table C.4.7: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
--	Agricultural Land Classification	M/X	A large proportion of this small settlement location is situated on ALC Grade 3 land, and a smaller proportion of the area of search is located on ALC Grade 2 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	Approximately half of this small settlement location, to the north and in the south-west, lies within a MSA, where consultation is required. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.4.8 SA Objective 8: Waste

Table C.4.8: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.4.9 SA Objective 9: Housing

Table C.4.9: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.4.10 SA Objective 10: Health

Table C.4.10: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
+	NHS Hospital with A&E Department	-	Location is partially in the sustainable target distance to the closest NHS hospital with an A&E department, which is 'Warwick Hospital'. A minor positive impact would be expected.
++	Access to GP Surgery	-	Location is substantially situated within 800m of a GP surgery. Major positive impact is expected.
-	Access to Leisure Facilities	M	The small settlement location is situated approximately 3.3km south of 'St Nicholas Park Leisure Centre'. Therefore, it is located outside of the target distance. <i>Mitigation: Potential for improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located over 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on future residents due to air quality and noise pollution could be expected, as the A452 runs along the western boundary of this location. In addition, the M40 runs along the south western corner. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	The majority of the small settlement location is situated within target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

C.4.11 SA Objective 11: Accessibility

Table C.4.11: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
+	Bus Stop	-	A minor positive impact could be expected as this small settlement location is partially situated within the target distance of a bus stop providing regular services.
-	Railway Station	M	A minor negative impact could be expected as the entirety of this small settlement location is situated outside the target distance of a train station providing regular services. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>
0	Connectivity	-	Connectivity around Bishop's Tachbrook varies. Areas to the east and west around the small settlement location are identified as having excellent connectivity (Grade A). With the other areas to the north and south identified as having moderate connectivity to the village centre (Grade C). A negligible impact on transport and connectivity could be expected overall.
-	Local Services	M	A large proportion of this small settlement location is situated outside the sustainable target distance to local services. A minor negative impact on access to local services would be expected. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>

C.4.12 SA Objective 12: Education

Table C.4.12: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
+	Access to Primary School	-	The majority of this small settlement location is situated within 800m of a primary school. Therefore, a minor positive impact will result due to the primary school being located within the desired target distance.
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of any secondary schools. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.4.13 SA Objective 13: Economy

Table C.4.13: The assessment of the small settlement location at 'Bishop's Tachbrook' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	BISHOP'S TACHBROOK: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within Royal Leamington Spa. A minor positive impact on the local economy could be expected.

C.5 Claverdon

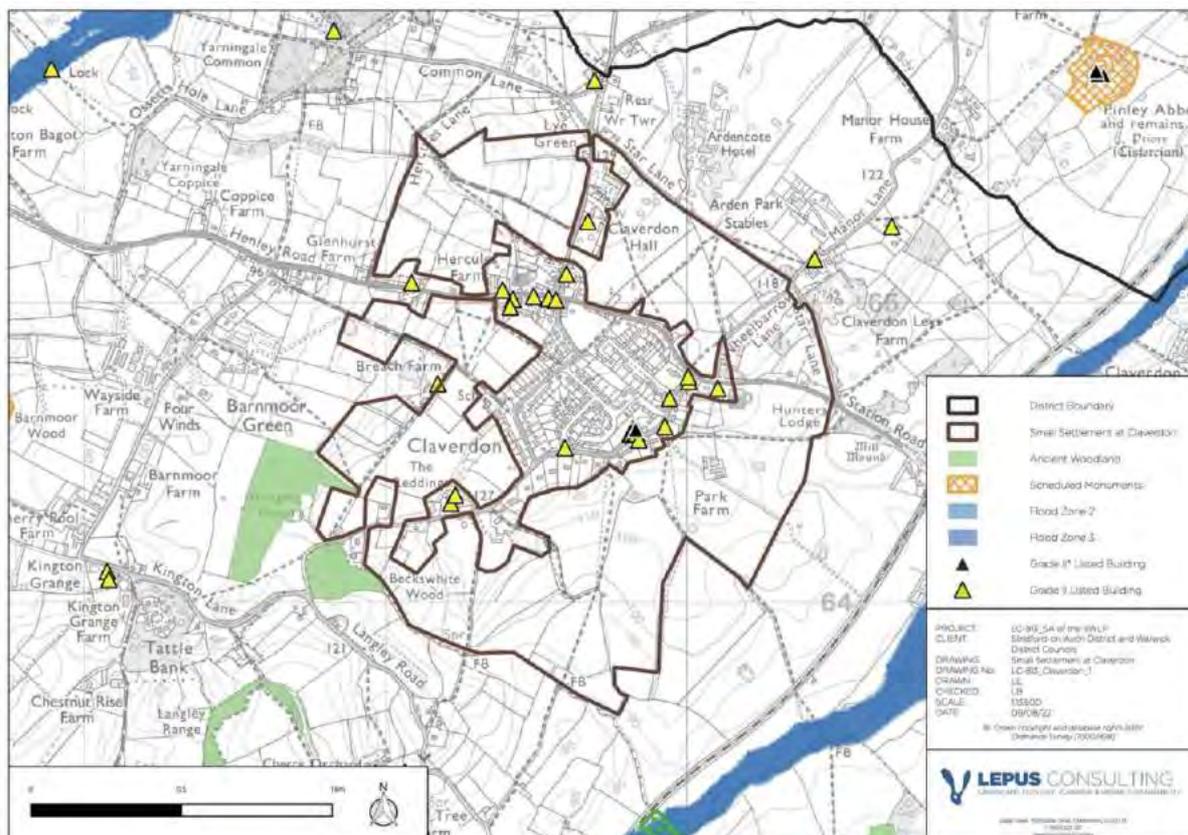


Figure C.5.1: Small settlement at Claverdon with selected constraints

C.5.1 SA Objective 1: Climate Change

Table C.5.1: The assessment of the small settlement location at ‘Claverdon’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	CLAVERDON: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.5.2 SA Objective 2: Flood Risk

Table C.5.2: The assessment of the small settlement location at 'Claverdon' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	CLAVERDON: Description of effect
+	Flood Zones	-	The site is located wholly within Flood Zone 1.
+	Surface Water Flood Risk	-	There are small areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 1% of the overall site area.

C.5.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.5.3: The assessment of the small settlement location at 'Claverdon' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	CLAVERDON: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar.
-	SSSIs	A	A minor negative impact could be expected as 'Railway Meadow, Langley' SSSI is located approximately 334m from the small settlement location. A proportion of the small settlement location coincides with an SSSI IRZ which requires consultation for residential development for 100 units or more, and outside existing urban settlements, development of 50 units or more. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	A minor negative impact could be expected as the ancient woodlands 'Hanging Wood' and 'Becks White Wood' are located adjacent to the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Wheel Barrow Lane', Hercules Lane', River Alne', 'Breach Farm', 'Langley Road Meadow', 'Fellows Meadow' and 'Harrow House Meadows' LWSs. Development in this location could have a minor negative impacts on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'Lowland Meadows'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.5.4 SA Objective 4: Landscape

Table C.5.4: The assessment of the small settlement location at 'Claverdon' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	CLAVERDON: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 17.1km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Ancient Arden local character area. This is characterised by a small-scale farmed landscape with varied, undulating topography, characterised by an irregular pattern of fields and narrow winding lanes. The south eastern section of this small settlement location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	This small settlement location wholly coincides with 'Arden' SLA, where a small proportion of the overall SLA could potentially be affected. A minor negative impact on local landscape could therefore be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.5.5 SA Objective 5: Cultural Heritage

Table C.5.5: The assessment of the small settlement location at 'Claverdon' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	CLAVERDON: Description of effect
0	Grade I Listed Building	-	Not located in proximity to a Grade I Listed Building.
-	Grade II* Listed Building	A/M	There is one Grade II* Listed Building in proximity of the small settlement location. The Grade II* listed building is 'Church of St Michael and All Angels'. There is the potential for minor negative impacts on the setting of this heritage asset. <i>Mitigation: This feature lies outside the Small Settlement. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>

Score	SA5: Receptor	Mitigation potential	CLAVERDON: Description of effect
-	Grade II Listed Building	A/M	There is one Grade II listed building 'Breach Farmhouse' which is immediately adjacent to the small settlement location, and there are a number of Grade II listed buildings in close proximity. These include Grade II Listed Buildings include 'The Reddings', 'Barn at the Reddings', 'Fox Hill', 'Claverdon Hall and Attached Walls and Gate Piers', 'Butchers Shop and House Adjoining', 'The Malt House', 'The Old Smithy', 'The Forge House', 'Park Farmhouse and Barn to the Right', 'Porlock View and Church View' and 'Red Lion Public House'. There is the potential for minor negative impacts on the setting of these heritage assets as the small settlement location wraps around all sides of this small settlement. <i>Mitigation: This feature lies outside the Small Settlement. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
-	Conservation Area	A/M	The small settlement location partially coincides with 'Claverdon' CA as it wraps round all sides of Claverdon. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.5.6 SA Objective 6: Pollution

Table C.5.6: The assessment of the small settlement location at 'Claverdon' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	CLAVERDON: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A4189 runs through the centre of this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
0	Watercourse	-	There are no watercourses within 200m of this small settlement location.
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.5.7 SA Objective 7: Natural Resources

Table C.5.7: The assessment of the small settlement location at 'Claverdon' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	CLAVERDON: Description of effect
--	Agricultural Land Classification	M/X	The whole area of this small settlement location is situated on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the

Score	SA7: Receptor	Mitigation potential	CLAVERDON: Description of effect
			potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	The majority of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.5.8 SA Objective 8: Waste

Table C.5.8: The assessment of the small settlement location at 'Claverdon' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	CLAVERDON: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.5.9 SA Objective 9: Housing

Table C.5.9: The assessment of the small settlement location at 'Claverdon' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	CLAVERDON: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.5.10 SA Objective 10: Health

Table C.5.10: The assessment of the small settlement location at 'Claverdon' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	CLAVERDON: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 7.9km east of the small settlement location. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
++	Access to GP Surgery	-	Majority of the small settlement location is located within 800m of a GP surgery. Major positive effect is expected.

Score	SA10: Receptor	Mitigation potential	CLAVERDON: Description of effect
-	Access to Leisure Facilities	M	The small settlement location is situated approximately 8.4km east of St Nicholas Park Leisure Centre. Therefore, the it is located outside of the target distance. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A negative impact on air quality and noise pollution could be expected as the A4189 runs through the centre of 'Claverdon'. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles. Nevertheless, there is little that can be done due to the main road going through the centre of this small settlement location.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

C.5.11 SA Objective 11: Accessibility

Table C.5.11: The assessment of the small settlement location at 'Claverdon' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	CLAVERDON: Description of effect
+	Bus Stop	-	A minor positive impact could be expected as the majority of this small settlement location is situated within the target distance to a bus stop providing regular services.
++	Railway Station	-	A minor positive impact could be expected as the majority of this small settlement location is situated within the target distance to a train station providing regular services.
-	Connectivity	M	Connectivity around Claverdon varies. Some areas to the north-west are identified as having excellent connectivity (Grade A) as well as areas to the south-west having moderate connectivity (Grade C). Other areas, in the north-east, are identified as lacking in connectivity to the village centre (Grade D). Without mitigation, development in less accessible areas may lead to a minor negative impact on transport and access. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
-	Local Services	M	A large proportion of this small settlement location is situated outside of the sustainable target distance to these facilities. A minor negative impact on access to food stores could be expected. <i>Mitigation: Potential for provision of improved active and public transport links to key services and facilities.</i>

C.5.12 SA Objective 12: Education

Table C.5.12: The assessment of the small settlement location at 'Claverdon' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	CLAVERDON: Description of effect
+	Access to Primary School	-	The majority of this small settlement location is situated within 800m of a primary school. Therefore, a minor positive impact will result due to the primary school being located within the desired target distance.
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of any secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	This small settlement location is situated within the sustainable target distance of an area that offers further education.

C.5.13 SA Objective 13: Economy

Table C.5.13: The assessment of the small settlement location at 'Claverdon' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	CLAVERDON: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

C.6 Cubbington

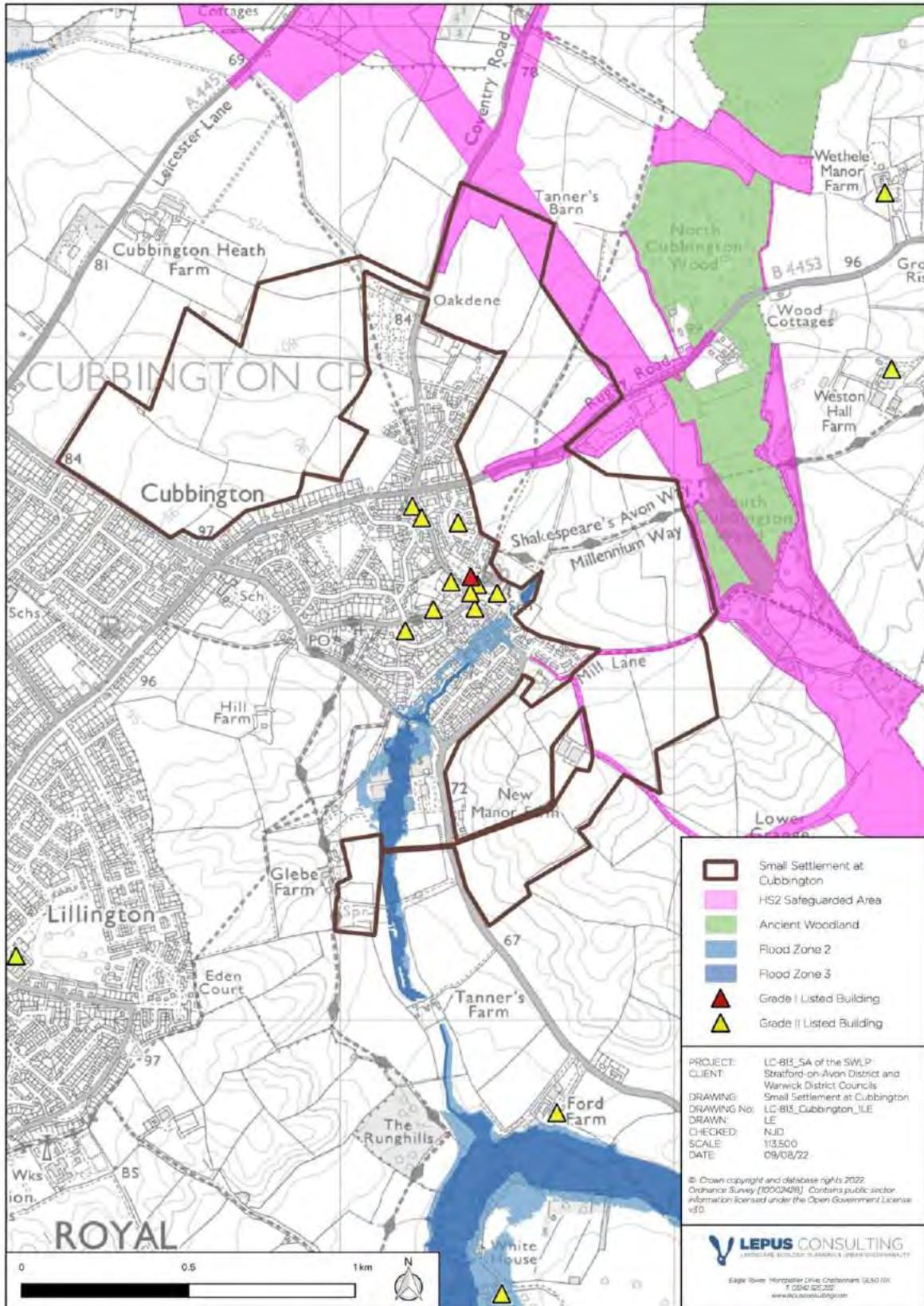


Figure C.6.1: Small settlement at Cubbington with selected constraints

C.6.1 SA Objective 1: Climate Change

Table C.6.1: The assessment of the small settlement location at ‘Cubbington’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	CUBBINGTON: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p><i>Mitigation:</i> The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.6.2 SA Objective 2: Flood Risk

Table C.6.2: The assessment of the small settlement location at ‘Cubbington’ against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	CUBBINGTON: Description of effect
0	Flood Zones	A/M	<p>The majority of the proposed location at ‘Cubbington’ lies in Flood Zone 1, the lowest risk of fluvial flooding. A very small proportion of land in the south west of the location (along the site’s boundaries) lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location.</p> <p><i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i></p>
0	Surface Water Flood Risk	A/M	<p>There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area.</p> <p><i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i></p>

C.6.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.6.3: The assessment of the small settlement location at ‘Cubbington’ against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	CUBBINGTON: Description of effect
+/-	Habitats Sites	-	<p>An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor’s Pools SAC, Lyppard Grange Ponds SAC, Dixton Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar.</p>

Score	SA3: Receptor	Mitigation potential	CUBBINGTON: Description of effect
			Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A/M	Ancient Woodland 'South Cubbington Wood' is located 21m, from the site. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	A minor negative impact on 'Cubbington Churchyard' and 'South Cubbington Wood' LWSs could be expected as they are located adjacent to the Small Settlement. <i>Mitigation: mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
0	Priority Habitats	-	The small settlement location does not coincide with any priority habitat.

C.6.4 SA Objective 4: Landscape

Table C.6.4: The assessment of the small settlement location at 'Cubbington' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	CUBBINGTON: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 18.6km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Dunsmore Character Area and within the Plateau Farmlands and Plateau Fringe local character areas. Plateau Farmlands is characterised by simple, often heavily wooded, farmed landscape, typically confined to low plateau summits with sandy soils and remnant heathy vegetation. Plateau Fringe is characterised by a variable, often large-scale farmed landscape with varied undulating topography and a nucleated settlement pattern of small, often shrunken villages. The north western and south eastern section of this small settlement location are identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in</i>

Score	SA4: Receptor	Mitigation potential	CUBBINGTON: Description of effect
			<i>terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This small settlement location coincides with various PRoW. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.6.5 SA Objective 5: Cultural Heritage

Table C.6.5: The assessment of the small settlement location at 'Cubbington' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	CUBBINGTON: Description of effect
-	Grade I Listed Building	A/M	Grade I Listed Building 'Church of St Mary' is located within the center of Cubbington around which the small settlement location is situated. There is potential for an impact on the setting of this feature. <i>Mitigation: This feature lies outside the Small Settlement. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
0	Grade II* Listed Building	-	Not located in proximity to a Grade II* Listed Building
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings within Cubbington. Given the small settlement location wraps round this small settlement there is the potential for minor negative impacts upon the setting of these features, for instance upon 'Cubbington Church of England School'. <i>Mitigation: These features lie outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to a Registered Parks and Garden.
0	Conservation Area	-	Not located in proximity to a Conservation Area.
0	Scheduled Monument	-	Not located in proximity to a Scheduled Monument.

C.6.6 SA Objective 6: Pollution

Table C.6.6: The assessment of the small settlement location at 'Cubbington' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	CUBBINGTON: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
0	Main Road	-	A negligible impact on future residents due to air quality and noise pollution could be expected as the A445 is located approximately 200m from this small settlement location for development.

Score	SA6: Receptor	Mitigation potential	CUBBINGTON: Description of effect
0	Railway Line	-	Not within 200m of a railway line.
0	Watercourse	-	There are no watercourses within 200m of this small settlement location.
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.6.7 SA Objective 7: Natural Resources

Table C.6.7: The assessment of Small Settlement at ‘Cubbington’ against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	CUBBINGTON: Description of effect
--	Agricultural Land Classification	M/X	<p>A large proportion of this small settlement location is situated on ALC Grade 3 land, with smaller parts of the area of search being located on ALC Grade 2 and even smaller areas on ‘urban’ land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils.</p> <p><i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i></p>
-	Mineral Safeguarding Area	M/X	<p>The whole of this small settlement location is situated within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected.</p> <p><i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i></p>

C.6.8 SA Objective 8: Waste

Table C.6.8: The assessment of the small settlement location at ‘Cubbington’ against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	CUBBINGTON: Description of effect
-	Potential increase in household waste generation	M	<p>Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development at this small settlement location.</p> <p><i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i></p>

C.6.9 SA Objective 9: Housing

Table C.6.9: The assessment of the small settlement location at ‘Cubbington’ against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	CUBBINGTON: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing

Score	SA9: Receptor	Mitigation potential	CUBBINGTON: Description of effect
			needs if developed, and as such, result in a major positive impact on housing provision.

C.6.10 SA Objective 10: Health

Table C.6.10: The assessment of the small settlement location at 'Cubbington' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	CUBBINGTON: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 5.4km west of the small settlement location. This lies outside the sustainable distance to access A&E services. A minor negative impact would be expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	The distance between the GP surgery and the small settlement location is 995m. A minor negative impact would be expected as the Broad Location is located outside of the target distance to GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	'The small settlement location is situated 1.7km north-west of 'Newbold Comyn Park Leisure Centre', outside of the target distance. A minor negative impact would be expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A445 is located approximately 198m from this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	The majority of the small settlement location is situated within the target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

C.6.11 SA Objective 11: Accessibility

Table C.6.11: The assessment of the small settlement location at 'Cubbington' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	CUBBINGTON: Description of effect
+	Bus Stop	-	A proportion of this small settlement location is situated within the target distance to regular bus services. A minor positive impact on site end users' access to sustainable transport would be expected.
-	Railway Station	M	A minor negative impact could be expected as the entirety of this small settlement location is situated outside the target distance to a train station providing regular services.

Score	SA11: Receptor	Mitigation potential	CUBBINGTON: Description of effect
			<i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
	Connectivity	-	Data not available.
-	Local Services	M	A large proportion of this small settlement location is situated outside the sustainable target distance to local services. A minor negative impact would be expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.6.12 SA Objective 12: Education

Table C.6.12: The assessment of the small settlement location at 'Cubbington' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	CUBBINGTON: Description of effect
+	Access to Primary School	-	The majority of this small settlement location is situated within 800m of a primary school. Therefore, a minor positive impact will result due to the primary school being located within the desired target distance.
-	Access to Secondary School	M	A minor negative impact can be expected as the majority of this location is outside the sustainable target distance of any secondary schools. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	This small settlement location is situated within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.6.13 SA Objective 13: Economy

Table C.6.13: The assessment of the small settlement location at 'Cubbington' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	CUBBINGTON: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities. A minor positive impact on the local economy could be expected.

C.7 Earlswood

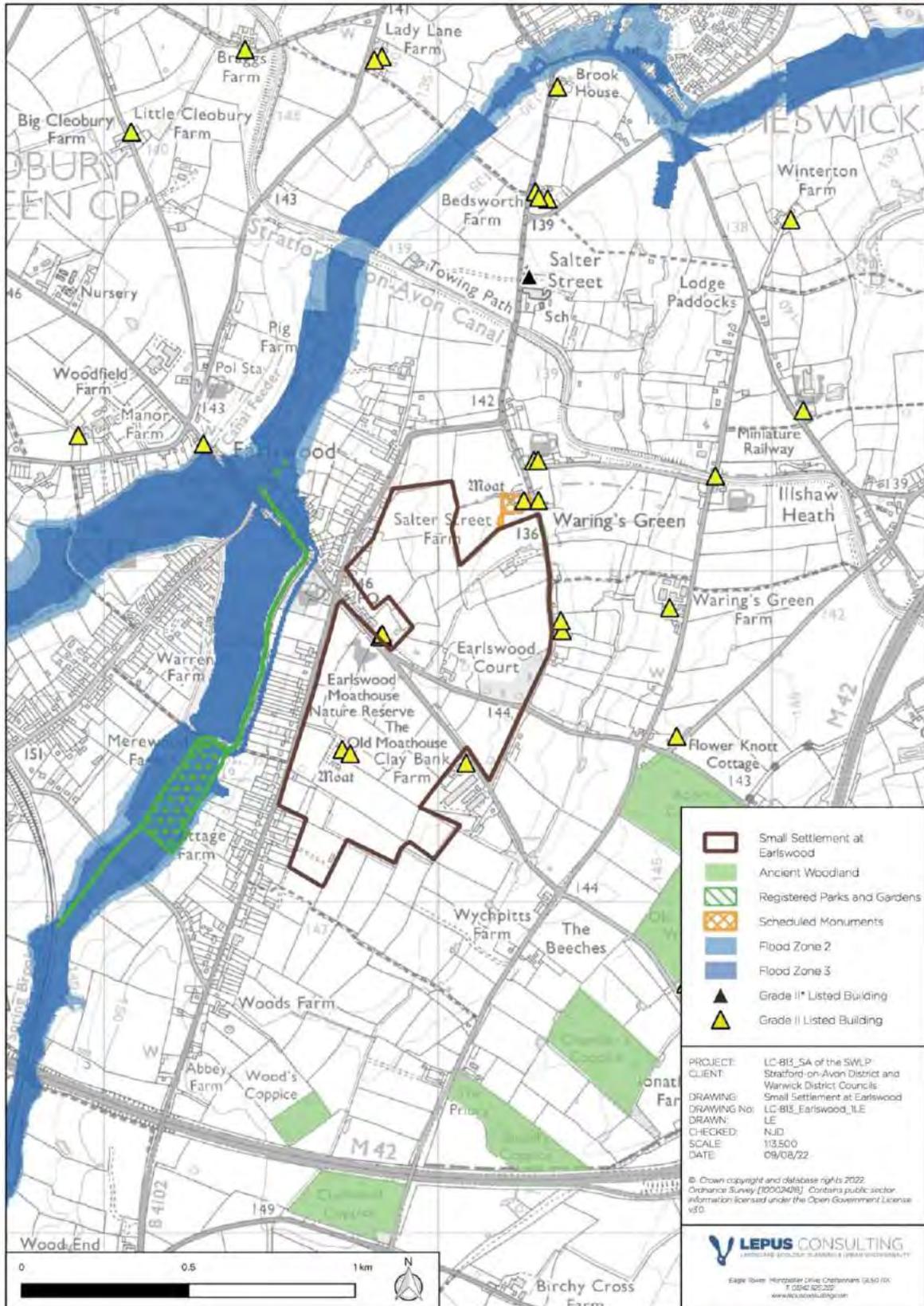


Figure C.7.1: Small settlement at Earlswood with selected constraints

C.7.1 SA Objective 1: Climate Change

Table C.7.1: The assessment of the small settlement location at 'Earlswood' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	EARLSWOOD: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p><i>Mitigation:</i> The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.7.2 SA Objective 2: Flood Risk

Table C.7.2: The assessment of the small settlement location at 'Earlswood' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	EARLSWOOD: Description of effect
+	Flood Zones	-	The small settlement location is located wholly in Flood Zone 1
+	Surface Water Flood Risk	-	There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 1% of the overall site area.

C.7.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.7.3: The assessment of small settlement location at 'Earlswood' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	EARLSWOOD: Description of effect
+/-	Habitats Sites	-	<p>An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar.</p> <p><i>Mitigation:</i> Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</p>
-	SSSIs	A	A minor negative impact could be expected as 'River Blythe' SSSI is located approximately 126m from the small settlement. A small proportion of the small settlement coincides with an SSSI IRZ which requires consultation for residential development for 50 units or more, and outside existing settlements / urban areas, development of 10 units or more.

Score	SA3: Receptor	Mitigation potential	EARLSWOOD: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	Ancient Woodland 'South Cubbington Wood' is located 21m, from the site. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Earlswood Moathouse', 'Grove Road Meadow' LWSs and fully coincides with 'Earlswood Court Cottage' LWS. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.7.4 SA Objective 4: Landscape

Table C.7.4: The assessment of the small settlement location at 'Earlswood' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	EARLSWOOD: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 27.1km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Arden Pastures local character area. Arden Pastures is characterised by a small scale, enclosed landscape, often pervaded by suburban influences and characterised by small fields, typically bordered by mature hedgerow trees. The small settlement location could be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>

Score	SA4: Receptor	Mitigation potential	EARLSWOOD: Description of effect
-	Special Landscape Areas	M	This small settlement location wholly coincides with 'Arden' SLA, where a small proportion of the overall SLA could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location is situated adjacent to various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.7.5 SA Objective 5: Cultural Heritage

Table C.7.5: The assessment of the small settlement location at 'Earlswood' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	EARLSWOOD: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
0	Grade II* Listed Building	-	Not located in proximity to a Grade II* Listed Building
-	Grade II Listed Building	A/M	This small settlement location coincides with Grade II Listed Buildings 'The Old Moat House' and 'Barn and Stables'. The area of search is also adjacent to a number of other Grade II Listed Buildings including 'Ashbury Cottage', 'Outhouse to Ashbury Cottage'. A major negative impact could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to a Registered Parks and Garden.
0	Conservation Area	-	Not located in proximity to a Conservation Area.
-	Scheduled Monument	A	A minor negative impact on the setting of 'Moated site and fishpond at Salter Street Farm' SM could be expected as it is located approximately 2.2m from the location, separated by open space. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>

C.7.6 SA Objective 6: Pollution

Table C.7.6: The assessment of the small settlement location at 'Earlswood' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	EARLSWOOD: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.

Score	SA6: Receptor	Mitigation potential	EARLSWOOD: Description of effect
0	Watercourse	-	There are no watercourses within 200m of this small settlement location.
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.7.7 SA Objective 7: Natural Resources

Table C.7.7: The assessment of the small settlement location at 'Earlswood' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	EARLSWOOD: Description of effect
--	Agricultural Land Classification	M/X	Just over half of the area of this small settlement location lies on ALC Grade 4 land, with the remainder being located on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	The majority of this small settlement location lies within a MSA, where consultation is required. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.7.8 SA Objective 8: Waste

Table C.7.8: The assessment of the small settlement location at 'Earlswood' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	EARLSWOOD: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown. However, there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.7.9 SA Objective 9: Housing

Table C.7.9: The assessment of the small settlement location at 'Earlswood' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	EARLSWOOD: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.7.10 SA Objective 10: Health

Table C.7.10: The assessment of small settlement location at 'Earlswood' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	EARLSWOOD: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Alexandra Hospital', approximately 9.9km south-west of 'Earlswood'. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Cannot wholly mitigate. Improving public transport services will indirectly benefit access to these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as this small settlement location is situated outside of the target distance to GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	'This small settlement location is situated 10.6km north from 'Studley Leisure Centre'. Therefore, it is located outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
+	Main Road	-	Located more than 200m from a main road. A minor positive impact on health is expected.
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	Located within target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

C.7.11 SA Objective 11: Accessibility

Table C.7.11: The assessment of the small settlement location at 'Earlswood' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	EARLSWOOD: Description of effect
+	Bus Stop	-	This small settlement location is situated partially within the target distance to regular bus services. A minor positive impact on site end users' access to sustainable transport options would be expected.
++	Railway Station	-	A minor positive impact could be expected as the majority of this small settlement location is situated within the target distance to a train station providing regular services.
0	Connectivity	-	Unlikely to have an impact on transport as the majority of this small settlement location lies within an area identified as having moderate connectivity to the existing settlement (Grade C). A negligible impact on transport and connectivity could be expected.
-	Local Services	M	A large proportion of this small settlement location is situated outside of the sustainable target distance to these facilities. A minor negative impact on access to food stores could be expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.7.12 SA Objective 12: Education

Table C.7.12: The assessment of the small settlement location at 'Earlswood' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	EARLSWOOD: Description of effect
-	Access to Primary School	M	A minor negative impact can be expected as most of this location is outside the sustainable target distance of a primary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Secondary School	M	A minor negative impact can be expected as most of this location is outside the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Further Education	M	A minor negative impact can be expected as most of this location is outside the sustainable target distance of Further Education. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.7.13 SA Objective 13: Economy

Table C.7.13: The assessment of the small settlement location at 'Earlswood' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	EARLSWOOD: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to one employment opportunity area. A minor positive impact on the local economy could be expected. However due to the limited number of employment opportunities this positive impact will be very small.

C.8 Hampton Magna

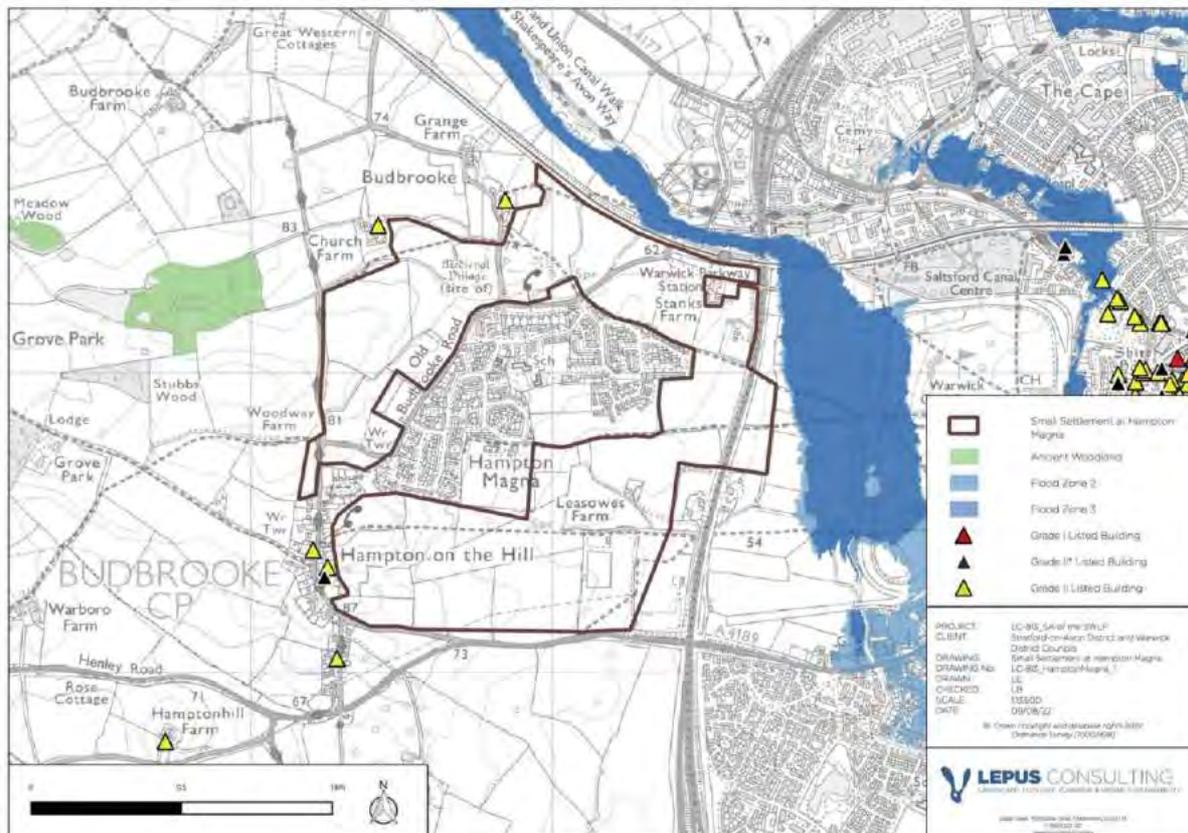


Figure C.8.1: Small settlement at Hampton Magna with selected constraints

C.8.1 SA Objective 1: Climate Change

Table C.8.1: The assessment of the small settlement location at ‘Hampton Magna’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.8.2 SA Objective 2: Flood Risk

Table C.8.2: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
+	Flood Zones	-	The small settlement location is located wholly in Flood Zone 1
0	Surface Water Flood Risk	A/M	<p>There are small areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area.</p> <p><i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i></p>

C.8.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.8.3: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
+/-	Habitats Sites	-	<p>An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar.</p> <p><i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i></p>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	<p>Located approximately 204m from a stand of ancient woodland with pedestrian access between the features. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure.</p> <p><i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i></p>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	<p>Partially coincides with 'Woodway Lane', 'River Avon and Tributaries' and 'Corner of field S of Hampton Magna' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation.</p> <p><i>Mitigation: Avoid impacts through the location and layout of future proposals.</i></p>
0	LGSs	-	There are no LGSs in proximity to the location.
0	Priority Habitats	-	The Small Settlement does not coincide with any priority habitat.

C.8.4 SA Objective 4: Landscape

Table C.8.4: The assessment of Small Settlement at ‘Hampton Magna’ against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 19km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Wooded Estatelands local character area. Wooded Estatelands is characterised by a well wooded estate landscape characterised by a large scale rolling topography and prominent hilltop woodlands. The small settlement location could be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of ‘high’ and ‘high-medium’ landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This small settlement location coincides with various PRoW. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development on this small settlement location could increase the risk of coalescence with ‘Warwick’. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

C.8.5 SA Objective 5: Cultural Heritage

Table C.8.5: The assessment of the small settlement location at ‘Hampton Magna’ against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
-	Grade II* Listed Building	A/M	There is one Grade II* Listed Building ‘Church of St Charles (Roman Catholic)’ adjacent to the small settlement location. There is the potential for minor negative impacts on the settings of this heritage asset. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings in close proximity to the small settlement location in areas surrounding Hampton Magna. These Grade II Listed Buildings include ‘St Charles Catholic Church Presbytery’, ‘10 and 11, Main Street’, ‘Church Farmhouse’ and ‘Church

Score	SA5: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
			of St Michael'. There is potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: These features lies outside the small settlement locations. It is likely that impacts on the significance of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to a Registered Parks and Garden.
0	Conservation Area	-	Not located in proximity to a Conservation Area.
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.8.6 SA Objective 6: Pollution

Table C.8.6: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A46 runs through the western boundary of this small settlement location, and the A41889 along the southern boundary. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
-	Railway Line	M	A railway line runs along the northern boundary of this location. A minor negative impact on future residents due to air and noise pollution and vibration could be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The Gog Brook (a tributary of the River Avon) flows through the northern section of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
-	Groundwater SPZ	M	The western section of the site lies within a Groundwater SPZ 1,2 & 3. Therefore a minor negative impact on groundwater quality could be expected. <i>Mitigation: Appropriate management of construction practices and appropriate design measures to prevent pollution of the groundwater.</i>

C.8.7 SA Objective 7: Natural Resources

Table C.8.7: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
--	Agricultural Land Classification	M/X	A large proportion of this small settlement location is situated on ALC Grade 3 land, with a small proportion of the site in the top north eastern corner located on ALC Grade 'Urban' land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversable uses.</i>
-	Mineral Safeguarding Area	M/X	The majority of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversable uses.</i>

C.8.8 SA Objective 8: Waste

Table C.8.8: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development at this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.8.9 SA Objective 9: Housing

Table C.8.9: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.8.10 SA Objective 10: Health

Table C.8.10: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
++	NHS Hospital with A&E Department	-	A major positive impact on access to healthcare would be expected as this small settlement location is wholly within the target distance to 'Warwick Hospital'.
++	Access to GP Surgery	-	A major positive impact on access to healthcare would be expected as this small settlement location is wholly within the target distance to 'Warwick Hospital'.
-	Access to Leisure Facilities	M	This small settlement location is situated approximately 2.2km east from 'St Nicholas Park Leisure Centre'. Therefore, it is situated outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on air quality and noise pollution could be expected as the A4189 is located adjacent to the south boundary of the small settlement location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	This small settlement location is situated within a target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

C.8.11 SA Objective 11: Accessibility

Table C.8.11: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
0	Connectivity	-	Connectivity around the small settlement location for development at Hampton Magna varies. Some areas to the north and north-west are identified as having very good connectivity (Grade A). Other areas, particularly to the south-east and south are identified as lacking in connectivity to the village centre (Grade D). A negligible impact on transport and connectivity could be expected overall.
+	Local Services	M	A proportion of this small settlement location is situated inside of the sustainable target distance to these facilities. A minor positive impact on access to food stores could be expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.8.12 SA Objective 12: Education

Table C.8.12: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
+	Access to Primary School	-	The majority of this small settlement location is situated within 800m of a primary school. Therefore, a minor positive impact will result due to the primary school being located within the desired target distance.
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	This small settlement location is situated wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.8.13 SA Objective 13: Economy

Table C.8.13: The assessment of the small settlement location at 'Hampton Magna' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	HAMPTON MAGNA: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within Warwick. A minor positive impact on the local economy could be expected.

C.9 Hatton Park

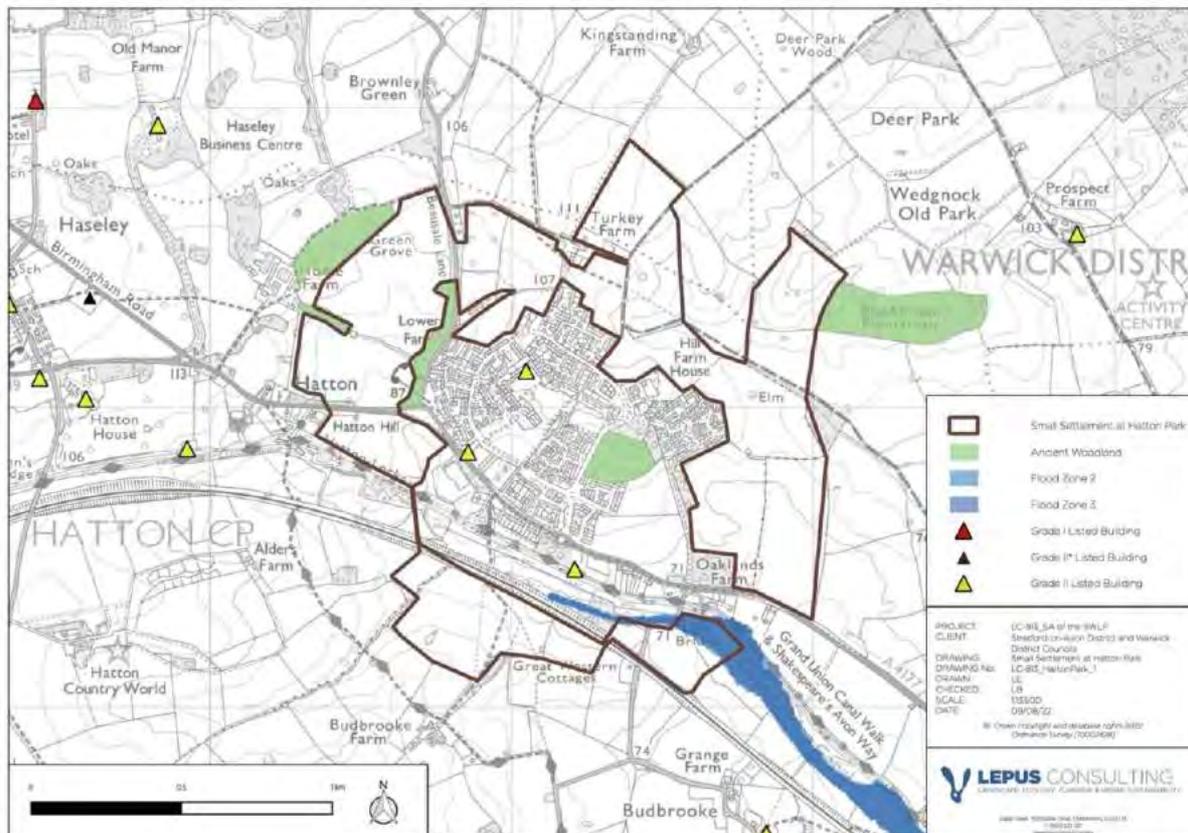


Figure C.9.1: Small settlement at Hatton Park with selected constraints

C.9.1 SA Objective 1: Climate Change

Table C.9.1: The assessment of the small settlement location at ‘Hatton Park’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	HATTON PARK: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.9.2 SA Objective 2: Flood Risk

Table C.9.2: The assessment of the small settlement location at 'Hatton Park' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	HATTON PARK: Description of effect
0	Flood Zones	A/M	The majority of land at the small settlement location at Hatton Park lies in Flood Zone 1, the lowest risk of fluvial flooding. A small proportion of land, associated with the Gog Brook, in the south-east of the location lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.9.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.9.3: The assessment of the small settlement location at 'Hatton Park' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	HATTON PARK: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	Ancient Woodland 'Green Grove' and 'Smiths Covert' are located adjacent to the site. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure as well as light and noise pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'River Avon and Tributaries', 'Budbrooke Farm Woodlands and Black Brake Plantation', 'Brownley Green Lane', 'Home Farm Woods', 'Hatton Hill Fields', 'Grand Union Canal', 'Hatton Locks Meadows' and 'Railway Embankment' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

Score	SA3: Receptor	Mitigation potential	HATTON PARK: Description of effect
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'traditional orchard'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.9.4 SA Objective 4: Landscape

Table C.9.4: The assessment of the small settlement location at 'Hatton Park' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	HATTON PARK: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 20.8km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Wooded Estatelands local character area. Wooded Estatelands is characterised by a well wooded estate landscape characterised by a large scale rolling topography and prominent hilltop woodlands. The small settlement location could be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development on this small settlement location could increase the risk of coalescence with 'Hatton'. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

C.9.5 SA Objective 5: Cultural Heritage

Table C.9.5: The assessment of the small settlement location at 'Hatton Park' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	HATTON PARK: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
-	Grade II* Listed Building	A/M	There is one Grade II* Listed Building, 'Church of Holy Trinity', situated to the north west of the small settlement location along the A4177. The small settlement location can be seen from this feature and as such a minor negative impact on setting may occur. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the site.</i>
-	Grade II Listed Building	A/M	There are three Grade II Listed Building within the small settlement of Hatton Park. It is likely that development at the small settlement location will only affect the setting at 'Lock House, Lock 34 on the Grand Union Canal'. <i>Mitigation: This feature lies outside the small settlement location. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the site.</i>
0	Registered Parks and Gardens	-	Not located in proximity to a Registered Parks and Garden.
0	Conservation Area	-	Not located in proximity to a Conservation Area.
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.9.6 SA Objective 6: Pollution

Table C.9.6: The assessment of the small settlement location at 'Hatton Park' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	HATTON PARK: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A4177 runs through the southern section of this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
-	Railway Line	A/M	The Chiltern Mainline railway line runs through the southern section of this small settlement location. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The Grand Union Canal runs through the southern section of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses.</i>

Score	SA6: Receptor	Mitigation potential	HATTON PARK: Description of effect
			<i>This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.9.7 SA Objective 7: Natural Resources

Table C.9.7: The assessment of the small settlement location at 'Hatton Park' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	HATTON PARK: Description of effect
--	Agricultural Land Classification	M/X	This small settlement location is wholly situated on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	A small proportion of the southern part of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.9.8 SA Objective 8: Waste

Table C.9.8: The assessment of the small settlement location at 'Hatton Park' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	HATTON PARK: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.9.9 SA Objective 9: Housing

Table C.9.9: The assessment of the small settlement location at 'Hatton Park' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	HATTON PARK: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.9.10 SA Objective 10: Health

Table C.9.10: The assessment of the small settlement location at 'Hatton Park' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	HATTON PARK: Description of effect
++	NHS Hospital with A&E Department	-	A major positive impact on access to healthcare would be expected as this small settlement location is wholly within the target distance to 'Warwick Hospital'.
-	Access to GP Surgery	M	A minor negative impact would be expected as this small settlement location is situated outside of the target distance to GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	This small settlement location is situated 3.2km north-west from 'St Nicholas Park Leisure Centre'. Therefore, it is located outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on air quality and noise pollution could be expected as the A4177 runs through the small settlement location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles. However, due to the fact the main road runs through this location mitigation is limited.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

C.9.11 SA Objective 11: Accessibility

Table C.9.11: The assessment of the small settlement location at 'Hatton Park' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	HATTON PARK: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
+	Railway Station	-	A minor positive impact could be expected as the small settlement location is partially situated within the target distance to a train station providing regular services.
-	Connectivity	M	Connectivity around the location at Hatton Park varies. Some areas to the to the south-east, north and north-east are identified as having great connectivity (Grade A) as well as some areas to the west having moderate connectivity (Grade C). Other areas, particularly to the north-east are identified as lacking in connectivity to the village centre (Grade D). Without mitigation, development in less accessible areas may lead to a minor negative impact on transport and access. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Local Services	-	A large proportion of this small settlement location is within the sustainable target distance to local services and therefore a minor positive impact on accessibility is expected.

C.9.12 SA Objective 12: Education

Table C.9.12: The assessment of the small settlement location at 'Hatton Park' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	HATTON PARK: Description of effect
-	Access to Primary School	M	A minor negative impact can be expected as the entirety of this location is outside the sustainable target distance of a primary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	This small settlement location is situated wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.9.13 SA Objective 13: Economy

Table C.9.13: The assessment of the small settlement location at 'Hatton Park' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	HATTON PARK: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within Warwick. A minor positive impact on the local economy could be expected.

C.10 Hatton Station

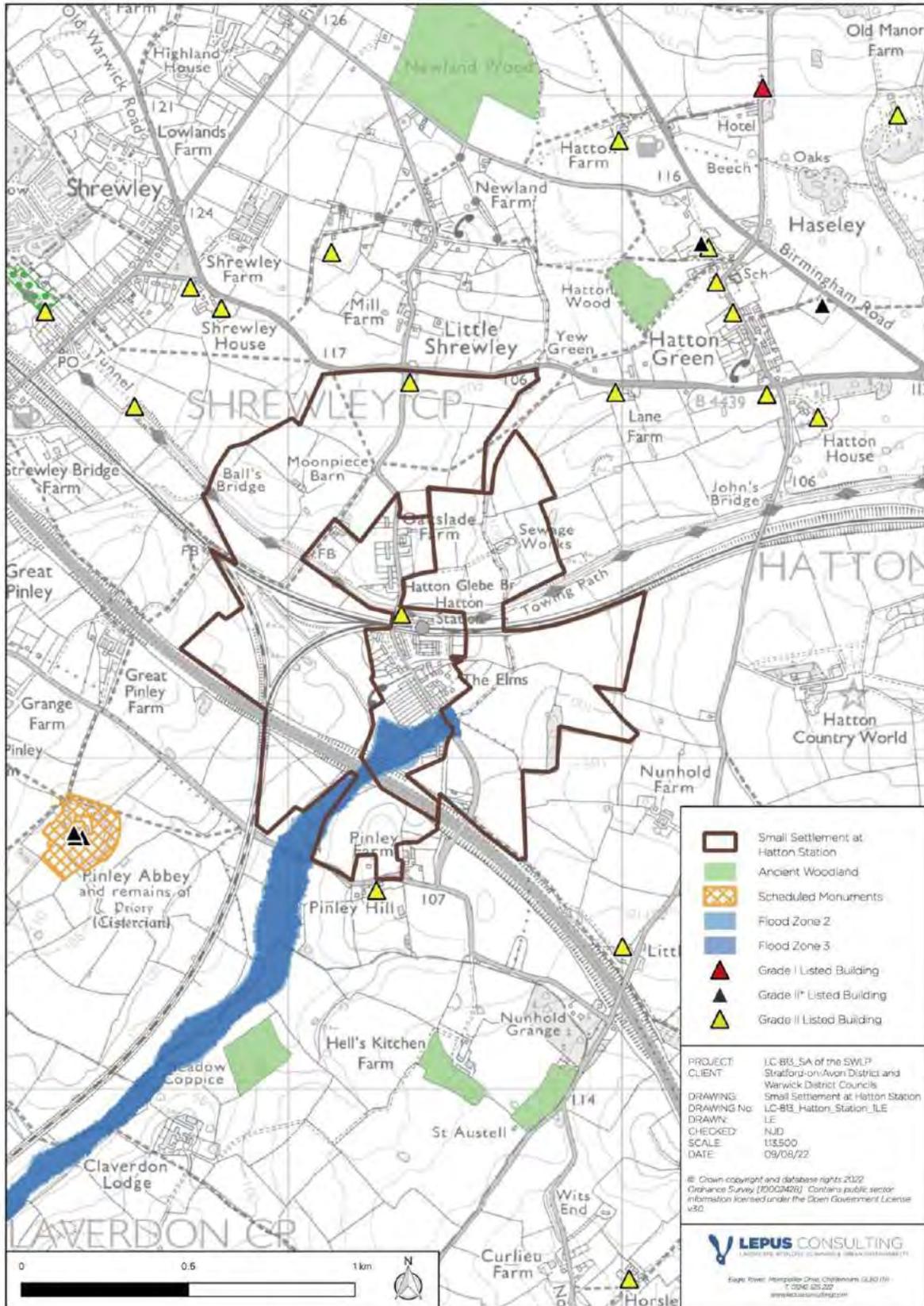


Figure C.10.1: Small settlement at Hatton Station with selected constraints

C.10.1 SA Objective 1: Climate Change

Table C.10.1: The assessment of the small settlement location at 'Hatton Station' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	HATTON STATION: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p><i>Mitigation:</i> The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.10.2 SA Objective 2: Flood Risk

Table C.10.2: The assessment of the small settlement location at 'Hatton Station' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	HATTON STATION: Description of effect
0	Flood Zones	A/M	<p>The majority of land at the small settlement location at 'Hatton Station' lies in Flood Zone 1, the lowest risk of fluvial flooding. A small proportion of land in the south-west of the location (along the site boundaries) lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location.</p> <p><i>Mitigation:</i> This impact could be mitigated through avoidance of Flood Zones 2 and 3.</p>
0	Surface Water Flood Risk	A/M	<p>There are areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area.</p> <p><i>Mitigation:</i> The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</p>

C.10.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.10.3: The assessment of the small settlement location at 'Hatton Station' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	HATTON STATION: Description of effect
+/-	Habitats Sites	-	<p>An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixton Woods SAC, Oxford</p>

Score	SA3: Receptor	Mitigation potential	HATTON STATION: Description of effect
			Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Wood', 'Veteran Oak – Pinley Hill', 'River Alne', 'Hatton Junction', 'Grand Union Canal', 'Hatton Marsh' and 'Meadows Bordering Grand Union Canal' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.10.4 SA Objective 4: Landscape

Table C.10.4: The assessment of the small settlement location at 'Hatton Station' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	HATTON STATION: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 19.5km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Wooded Estatelands and Ancient Arden local character area. Wooded Estatelands is characterised by a well wooded estate landscape characterised by a large scale rolling topography and prominent hilltop woodlands. Ancient Arden is characterised by small scale farmed landscape with varied, undulating topography, characterised by an irregular pattern of fields and narrow winding lanes. The south western section of this location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity</i>

Score	SA4: Receptor	Mitigation potential	HATTON STATION: Description of effect
			<i>for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	This small settlement location is situated approximately 250m from the 'Arden' SLA and therefore there is potential for minor negative impacts associated with development at this location.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.10.5 SA Objective 5: Cultural Heritage

Table C.10.5: The assessment of the small settlement location at 'Hatton Station' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	HATTON STATION: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
-	Grade II* Listed Building	A/M	The closest Grade II* Listed Buildings are associated with Pinley Abbey and the remains of Priory Church. These are situated approximately 520m to the south west of the small settlement location and are visible over open ground. This may result in a minor negative impact upon the setting of these features. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>
-	Grade II Listed Building	A/M	There is one Grade II Listed Building which is coincident with the small settlement location, 'Thrackhum Hall'. There are two further Grade II Listed Buildings within close proximity to the small settlement location, including 'Station House' and 'Pinley Hill Farmhouse'. There is potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: These features lie both inside and outside the small settlement location. It is likely that impacts on the significance of these assets could be avoided through the layout and design of the proposals. .</i>
0	Registered Parks and Gardens	-	Not located in proximity to a Registered Parks and Garden.
0	Conservation Area	-	Not located in proximity to a Conservation Area.
-	Scheduled Monument	A	There is a Scheduled Monument in proximity to the area of search known as 'Pinley Priory: A Cistercian nunnery and post-Dissolution Garden'. It is situated approximately 410m from the area of search, over open ground. This would be expected to lead to a minor negative impact on the setting of the Scheduled Monument. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>

C.10.6 SA Objective 6: Pollution

Table C.10.6: The assessment of the small settlement location at 'Hatton Station' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	HATTON STATION: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the M40 runs through the south western section of this small settlement location. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
-	Railway Line	A/M	The Chiltern Main Line intersects a branch line within this small settlement location. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The Grand Union Canal runs through the south western section of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.10.7 SA Objective 7: Natural Resources

Table C.10.7: The assessment of the small settlement location at 'Hatton Station' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	HATTON STATION: Description of effect
--	Agricultural Land Classification	M/X	This small settlement location is wholly located on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Mitigation is challenging. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses. Soil loss is an irreversible effect.</i>
-	Mineral Safeguarding Area	M/X	A majority of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.10.8 SA Objective 8: Waste

Table C.10.8: The assessment of the small settlement location at 'Hatton Station' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	HATTON STATION: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.10.9 SA Objective 9: Housing

Table C.10.9: The assessment of the small settlement location at 'Hatton Station' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	HATTON STATION: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.10.10 SA Objective 10: Health

Table C.10.10: The assessment of the small settlement location at 'Hatton Station' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	HATTON STATION: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 5.4km east of 'Hatton Station'. This location lies outside the sustainable distance to access A&E services. A minor negative impact would be expected. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the small settlement location is situated outside the target distance to a GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	This small settlement location is situated approximately 6km west 'St Nicholas Park Leisure Centre'. Therefore, it is located outside of the target distance. A minor negative impact would be expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on air quality and noise pollution could be expected as the M40 runs through the south of the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain</i>

Score	SA10: Receptor	Mitigation potential	HATTON STATION: Description of effect
			<i>and enhance air quality and provide electric charging for vehicles.</i>
-	Access to Greenspace	-	A minor negative impact on health could be expected as a large proportion is not located in proximity of any greenspace. <i>Mitigation: Provision of greenspace within development design.</i>
+	Access to PRow / Cycle Path Networks	-	Located within target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

C.10.11 SA Objective 11: Accessibility

Table C.10.11: The assessment of the small settlement location at 'Hatton Station' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	HATTON STATION: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
-	Connectivity	M	The majority of the small settlement location lies within areas of poor (Grade D) and moderate (Grade C) connectivity, a large proportion in the to the north sits within an area of moderate connectivity. A proportion of the small settlement location to the south lies within an area identified as having very poor connectivity to the existing settlement (Grade E). A minor negative impact on transport could be expected. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
-	Local Services	M	This small settlement location is situated outside of the sustainable target distance to local services and therefore a minor negative impact on accessibility is expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.10.12 SA Objective 12: Education

Table C.10.12: The assessment of the small settlement location at 'Hatton Station' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	HATTON STATION: Description of effect
-	Access to Primary School	M	A minor negative impact can be expected as the entirety of this location is outside the sustainable target distance of a primary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	This small settlement location is situated wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.10.13 SA Objective 13: Economy

Table C.10.13: The assessment of the small settlement location at 'Hatton Station' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	HATTON STATION: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to a few employment opportunities. A minor positive impact on the local economy could be expected. However, due to the limited number of employment opportunities this positive impact will be very small.

C.11 Henley

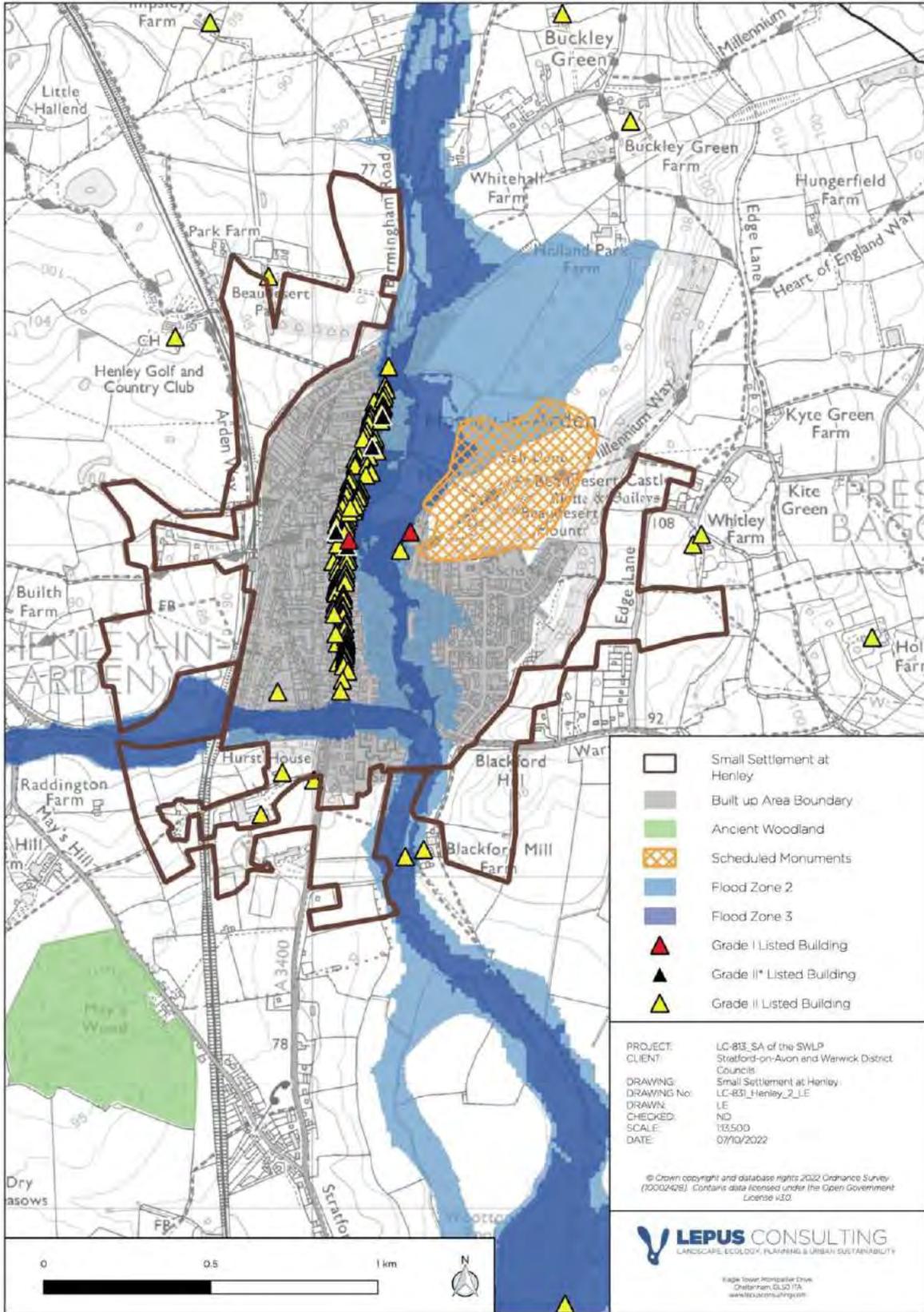


Figure C.11.1: Small settlement at Henley with selected constraints

C.11.1 SA Objective 1: Climate Change

Table C.11.1: The assessment of the small settlement location at 'Henley' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	HENLEY: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p><i>Mitigation:</i> The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.11.2 SA Objective 2: Flood Risk

Table C.11.2: The assessment of the small settlement location at 'Henley' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	HENLEY: Description of effect
0	Flood Zones	A/M	<p>The majority of land at the small settlement location surrounding Henley-in-Arden lies in Flood Zone 1, the lowest risk of fluvial flooding. A very small proportion of land in the centre and to the west of the location lies in Flood Zone 3, this is located towards the boundaries of this site.</p> <p><i>Mitigation:</i> This impact could be mitigated through avoidance of Flood Zones 2 and 3.</p>
0	Surface Water Flood Risk	A/M	<p>There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area.</p> <p><i>Mitigation:</i> The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</p>

C.11.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.11.3: The assessment of the small settlement location at 'Henley' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	HENLEY: Description of effect
+/-	Habitats Sites	-	<p>An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar.</p>

Score	SA3: Receptor	Mitigation potential	HENLEY: Description of effect
			<i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	Located approximately 200m from a stand of ancient woodland 'Mays Wood' with connections between these features on PRow. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure. <i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Beaudesert Mount', 'River Alne', 'Railway Cutting', 'Henley Meadows' and 'Dismantled Railway Line' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'good quality semi-improved grassland'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.11.4 SA Objective 4: Landscape

Table C.11.4: The assessment of the small settlement location at 'Henley' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	HENLEY: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 18.5km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Wooded Estatelands and Ancient Arden local character area. Wooded Estatelands is characterised by a well wooded estate landscape characterised by a large scale rolling topography and prominent hilltop woodlands. Ancient Arden is characterised by small scale farmed landscape with varied, undulating topography, characterised by an irregular pattern of fields and narrow winding lanes. The western section of this location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high-medium' landscape sensitivity.

Score	SA4: Receptor	Mitigation potential	HENLEY: Description of effect
			<i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	This small settlement location coincides entirely with 'Arden' SLA, where a small proportion of the overall SLA could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.11.5 SA Objective 5: Cultural Heritage

Table C.11.5: The assessment of the small settlement location at 'Henley' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	HENLEY: Description of effect
0	Grade I Listed Building	-	There are two Grade I Listed Buildings in the small settlement of Henley-in-Arden, 'Church of St Nicholas' and 'Church of St John the Baptist including wall to Guildhall'. The small settlement location for development is unlikely to cause adverse effects to arise.
-	Grade II* Listed Building	A/M	There are four Grade II* Listed Buildings within the small settlement of Henley-on-Arden 'Brook House', 'St Loes', 'Barclays Bank' and 'The White Swan Hotel'. The small settlement location for development is located around the boundary of this small settlement on all sides. It is therefore likely that there may be a minor negative impact upon the setting of these features. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals.</i>
-	Grade II Listed Building	A/M	The small settlement location coincides with one Grade II Listed Building - 'Arden House School War Memorial' which is on the periphery of the identified site boundary. There are also a significant number of other Grade II Listed Buildings within the small settlement itself, with a particular focus along the high street. Many of these will be visible from development around the small settlement, including 'Hurst House', 'Ardenhouse Preparatory School', 'Beaudesert Park', 'Blackford Mill' and 'Farm Buildings'. A minor negative impact could be expected. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals.</i>
0	Registered Parks and Gardens	-	Not located in proximity to a Registered Parks and Garden.
-	Conservation Area	A/M	The 'Henley in Arden' CA extends along the high street and into other areas of Henley-in-Arden. There is some overlap with the boundaries of the identified small settlement location for development towards the edges of the site. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>

Score	SA5: Receptor	Mitigation potential	HENLEY: Description of effect
-	Scheduled Monument	A	'Beaudesert Castle: motte and bailey castle and two fishponds' SM is located on the north eastern boundary of Henley-in-Arden. The small settlement location for development extends around this small settlement and therefore a minor negative impact on the settings of this SM could be expected. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals.</i>

C.11.6 SA Objective 6: Pollution

Table C.11.6: The assessment of the small settlement location at 'Henley' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	HENLEY: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A3400 and the A4189 coincide with the small settlement. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
-	Railway Line	A/M	A railway line runs in a north – south direction through the centre of this small settlement location. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The River Alne runs through the centre of this small settlement location for development in a southerly direction, converging with a tributary in the centre of Henley-in-Arden. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.11.7 SA Objective 7: Natural Resources

Table C.11.7: The assessment of the small settlement location at 'Henley' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	HENLEY: Description of effect
--	Agricultural Land Classification	M/X	The majority of this small settlement location is situated on ALC Grade 3 land with a smaller proportion is located upon ALC Grade 4 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>

Score	SA7: Receptor	Mitigation potential	HENLEY: Description of effect
-	Mineral Safeguarding Area	M/X	The majority of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.11.8 SA Objective 8: Waste

Table C.11.8: The assessment of small settlement location at 'Henley' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	HENLEY: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.11.9 SA Objective 9: Housing

Table C.11.9: The assessment of the small settlement location at 'Henley' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	HENLEY: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.11.10 SA Objective 10: Health

Table C.11.10: The assessment of the small settlement location at 'Henley' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	HENLEY: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is Alexandra Hospital, approximately 8.2km west of this small settlement location. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
++	Access to GP Surgery	-	This majority of this small settlement location is situated within 800m of a GP surgery.
-	Access to Leisure Facilities	M	This small settlement location is situated approximately 7.5km away from 'Studley Leisure Centre'. Therefore, the small settlement location is situated outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

Score	SA10: Receptor	Mitigation potential	HENLEY: Description of effect
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A negative impact on air quality and noise pollution could be expected as the A4189 and A3400 pass through this small settlement location and may therefore create a source of pollution for new residents. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	Located within target distance to the PRoW and cycle network. A minor positive impact on health and wellbeing is expected.

C.11.11 SA Objective 11: Accessibility

Table C.11.11: The assessment of the small settlement location at 'Henley' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	HENLEY: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
-	Connectivity	M	Connectivity around Henley-in-Arden varies. Some areas to the north and south are identified as having moderate connectivity (Grade C). Other areas, particularly to the east and west are identified as lacking in connectivity to the village centre (Grade D) there is also a small area to the north-east with very poor connectivity (Grade E). Without mitigation, development in less accessible areas may lead to a minor negative impact on transport and access. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Local Services	-	Areas of this small settlement location are situated within the target distance to local services and therefore a minor positive impact on accessibility is expected.

C.11.12 SA Objective 12: Education

Table C.11.12: The assessment of the small settlement location at 'Henley' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	HENLEY: Description of effect
+	Access to Primary School	-	This small settlement location is situated within 800m of a primary school and therefore a minor positive impact is expected.
+	Access to Secondary School	-	This small settlement location is situated within 1.5km of a secondary school. Consequently, a minor positive impact is expected.
-	Access to Further Education	M	This small settlement location is situated wholly outside of the target distance to post-16 (further) education. A minor negative impact on access to these educational facilities would be expected.

Score	SA12: Receptor	Mitigation potential	HENLEY: Description of effect
			<i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.11.13 SA Objective 13: Economy

Table C.11.13: The assessment of the small settlement location at 'Henley' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	HENLEY: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to a few employment opportunities. A minor positive impact on the local economy could be expected. However due to the limited number of employment opportunities this positive impact will be very small.

C.12 Kineton

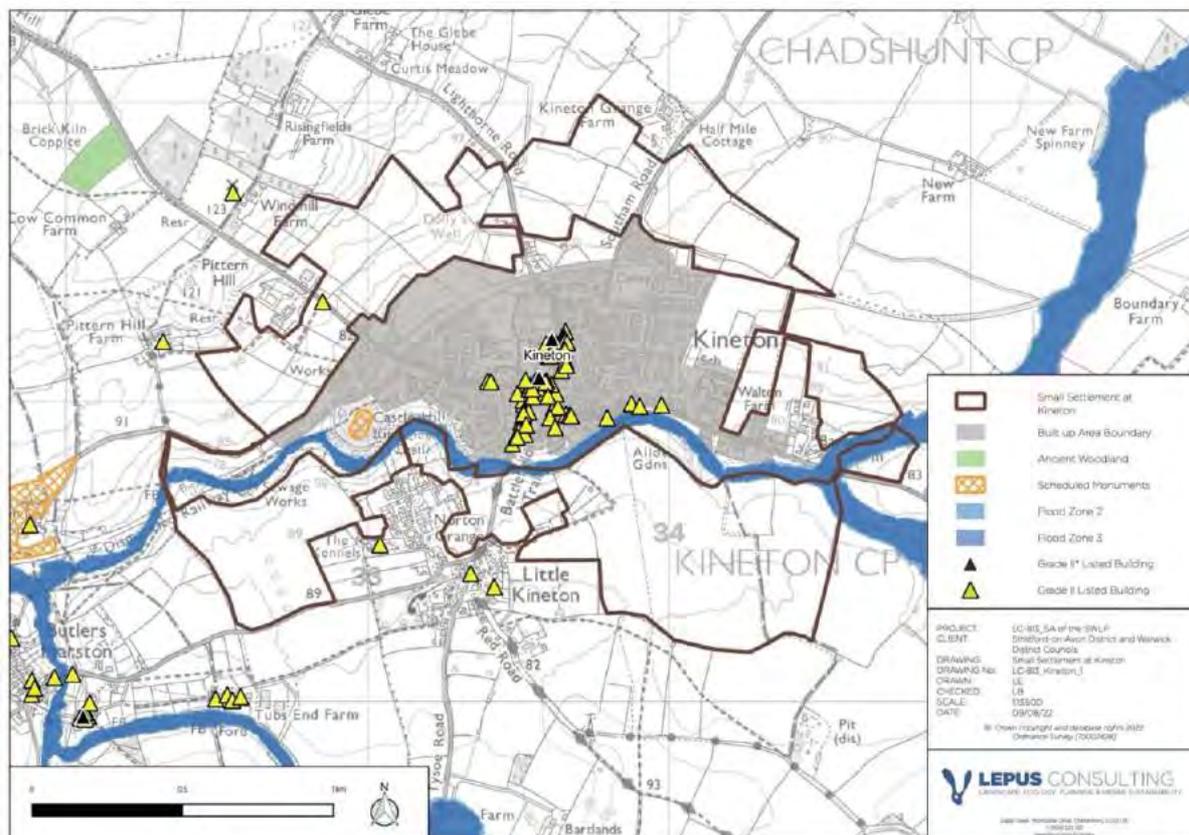


Figure C.12.1: Small settlement at Kineton with selected constraints

C.12.1 SA Objective 1: Climate Change

Table C.12.1: The assessment of the small settlement location at ‘Kineton’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KINETON: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.12.2 SA Objective 2: Flood Risk

Table C.12.2: The assessment of the small settlement location at 'Kineton' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KINETON: Description of effect
0	Flood Zones	A/M	The majority of land at the small settlement location at Kineton lies in Flood Zone 1, the lowest risk of fluvial flooding. A narrow strip of land which runs to the south of Kineton, following the course of the River Dene, is coincident with the boundaries of this proposed location and lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are scattered areas of low, medium and high SWFR across the small settlement location, predominantly at the site boundaries. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.12.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.12.3: The assessment of the small settlement location at 'Kineton' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KINETON: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
-	SSSIs	-	A minor negative impact could be expected as 'Lobington Hall Farm Meadow' SSSI is located approximately 1.2km from this proposed location. Part of the location coincides with a SSSI IRZ which requires consultation for residential development for 100 units or more in areas outside existing settlements / urban areas. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no Ancient Woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'River Dene', 'Red House Farm Meadows', 'Kineton Manor Meadow', 'King Johns Castle', 'Disused Railway' and 'Pitern Hill' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.

Score	SA3: Receptor	Mitigation potential	KINETON: Description of effect
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'traditional orchard'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.12.4 SA Objective 4: Landscape

Table C.12.4: The assessment of the small settlement location at 'Kineton' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KINETON: Description of effect
-	Cotswold AONB (National Landscape)	M	A minor negative impact on the setting of Cotswolds AONB could be expected as this location is situated approximately 3km to the north west of the AONB, separated by open space and a military base. <i>Mitigation: Mitigate impacts through the layout and design of GI and development</i>
-	Landscape Character	M	This small settlement location is situated in the Feldon Character Area and within the Lias Village Farmlands and Vale Farmlands local character areas. Lias Village Farmlands is characterised by a varied small scale, hedged landscape of scattered farms and nucleated brick and stone villages. Vale Farmlands is characterised by a flat, open, hedged landscape with few roads or settlements and characterised by wide views to rising ground on one or more sides. The south eastern section of this location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	This small settlement location is situated approximately 962m from the 'Feldon Parkland' SLA and therefore there is potential for minor negative impacts associated with development at this location.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.12.5 SA Objective 5: Cultural Heritage

Table C.12.5: The assessment of the small settlement location at 'Kineton' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KINETON: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
-	Grade II* Listed Building	A/M	There are two Grade II* Listed Buildings located within the small settlement of Kineton, 'Church of St Peter' and 'The Old Cottage Bakery'. The small settlement location for development wraps round the boundaries of the small settlement and therefore there may be some minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the significance of these assets could be avoided through the location, layout and design of the proposals.</i>
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings within Kineton itself. These Grade II Listed Buildings include, 'Warwickshire Hunt Stables and Kennels', Milepost at NGR SP 328 513, 'Kinecot' there are also a large number of Grade II Listed Buildings centered around Kineton High Street. There is potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the significance of these assets could be avoided through the layout and design of the proposals.</i>
--	Registered Parks and Gardens	A	Not in close proximity to a RPG. The southern section of this small settlement location is however coincident with an area designated as a Registered Battlefield (Battlefield of Edgehill 1642). <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>
-	Conservation Area	A/M	This small settlement location for development lies around the boundaries of the 'Kineton' and 'Little Kineton' CAs. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
-	Scheduled Monument	A	The SM 'King John's Castle' is located 72m from the small settlement location and the SM 'Medieval settlement at Brookhampton' is located approximately 285m from the small settlement location, separated by open space. Development at this location could result in a minor negative impact on the setting of these SMs. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>

C.12.6 SA Objective 6: Pollution

Table C.12.6: The assessment of the small settlement location at 'Kineton' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KINETON: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The River Dene flows through the centre of Kineton and this small settlement location for development. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development.

Score	SA6: Receptor	Mitigation potential	KINETON: Description of effect
			<i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.12.7 SA Objective 7: Natural Resources

Table C.12.7: The assessment of the small settlement location at 'Kineton' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	KINETON: Description of effect
--	Agricultural Land Classification	M/X	This small settlement location is wholly located on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversable uses.</i>
-	Mineral Safeguarding Area	M/X	The majority of this small settlement location lies within a MSA, where consultation is required. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversable uses.</i>

C.12.8 SA Objective 8: Waste

Table C.12.8: The assessment of the small settlement location at 'Kineton' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KINETON: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.12.9 SA Objective 9: Housing

Table C.12.9: The assessment of the small settlement location at 'Kineton' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KINETON: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.12.10 SA Objective 10: Health

Table C.12.10: The assessment of the small settlement location at 'Kineton' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KINETON: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'The Horton General Hospital', approximately 15.3km south-east of 'Kineton'. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Improving public transport services will improve access to these services.</i>
++	Access to GP Surgery	-	Majority of small settlement location is located within 800m of a GP surgery.
-	Access to Leisure Facilities	M	This small settlement location is situated approximately 6.1km away from 'Wellesbourne Sports and Community Centre', outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
+	Main Road	-	Small settlement location is located over 200m from a main road.
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle network. A minor positive impact on health and wellbeing is expected.

C.12.11 SA Objective 11: Accessibility

Table C.12.11: The assessment of the small settlement location at 'Kineton' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	KINETON: Description of effect
+	Bus Stop	-	Areas of this small settlement location are within the target distance to a bus stop providing regular services and therefore a minor positive impact on accessibility is expected.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
0	Connectivity	-	Connectivity around Kineton varies. Some areas to the North-East and North-West are identified as having very good connectivity (Grade A). Other areas, particularly to the south, east and west are identified as having moderate connectivity to the village centre (Grade C) as well as a small area to the South-East with poor connectivity (Grade D). A negligible impact on transport and connectivity could be expected overall.
+	Local Services	-	A large proportion of this small settlement location is situated within the sustainable target distance to local services and therefore a minor positive impact on accessibility is expected.

C.12.12 SA Objective 12: Education

Table C.12.12: The assessment of the small settlement location at 'Kineton' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KINETON: Description of effect
+	Access to Primary School	-	This small settlement location is located within 800m of a primary school therefore a minor positive impact would be expected.

Score	SA12: Receptor	Mitigation potential	KINETON: Description of effect
+	Access to Secondary School	-	This small settlement location is located within 1.5km of a secondary school therefore a minor positive impact would be expected.
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education therefore a minor positive impact on access to these educational facilities would be expected.

C.12.13 SA Objective 13: Economy

Table C.12.13: The assessment of the small settlement location at 'Kineton' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KINETON: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to one employment opportunity, A minor positive impact on the local economy could be expected. However due to the limited number of employment opportunities this positive impact will be very small.

C.13 Kingswood

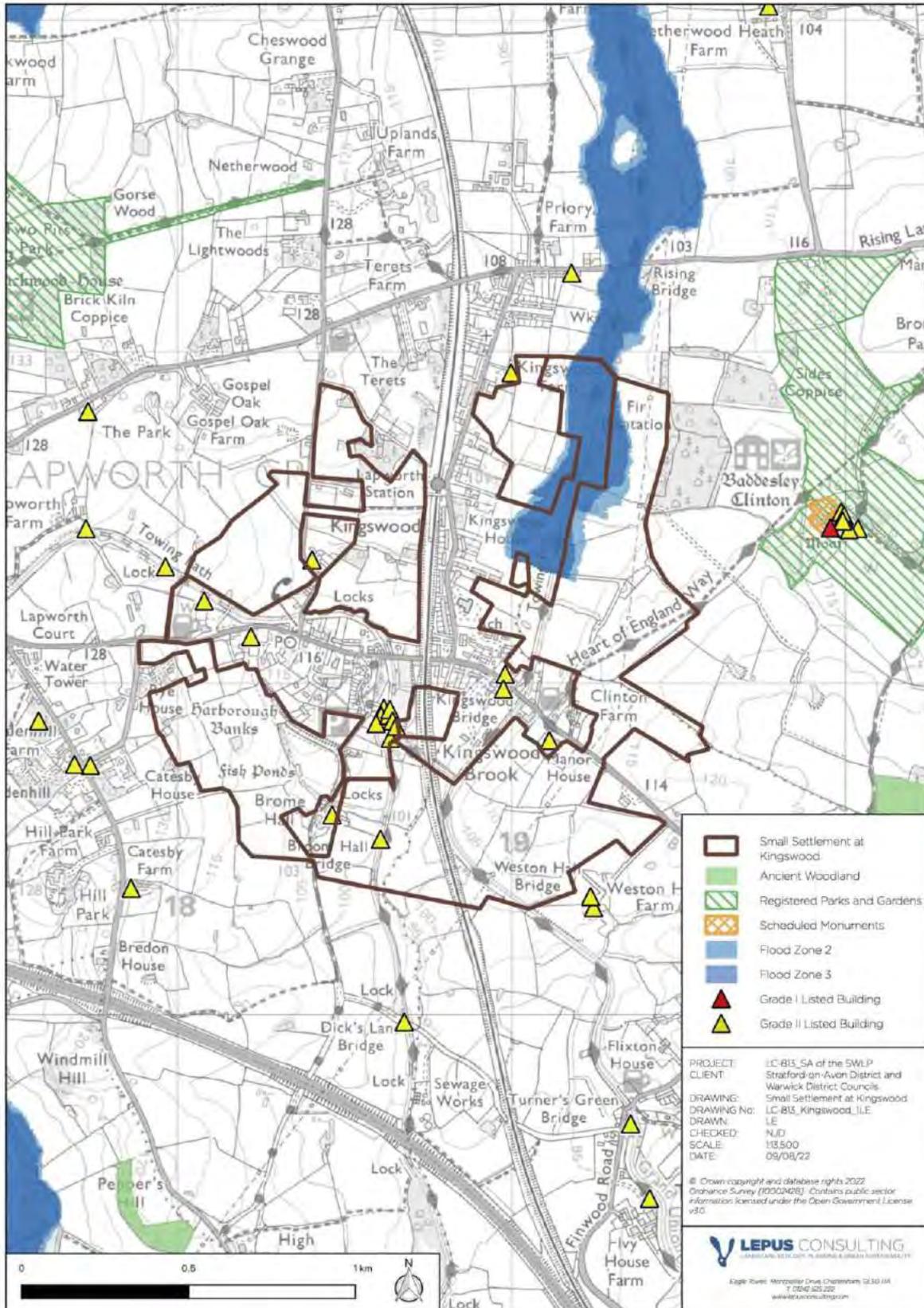


Figure C.13.1: Small settlement at Kingswood with selected constraints

C.13.1 SA Objective 1: Climate Change

Table C.13.1: The assessment of the small settlement location at 'Kingswood' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	KINGSWOOD: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p><i>Mitigation:</i> The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.13.2 SA Objective 2: Flood Risk

Table C.13.2: The assessment of the small settlement location at 'Kingswood' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	KINGSWOOD: Description of effect
0	Flood Zones	A/M	<p>The majority of land at the small settlement location surrounding Kingswood lies in Flood Zone 1, the lowest risk of fluvial flooding. A very small proportion of land to the north of this location (along its boundaries) lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location.</p> <p><i>Mitigation:</i> This impact could be mitigated through avoidance of Flood Zones 2 and 3.</p>
0	Surface Water Flood Risk	A/M	<p>There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area.</p> <p><i>Mitigation:</i> The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</p>

C.13.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.13.3: The assessment of the small settlement location at 'Kingswood' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	KINGSWOOD: Description of effect
+/-	Habitats Sites	-	<p>An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixton Woods SAC, Oxford</p>

Score	SA3: Receptor	Mitigation potential	KINGSWOOD: Description of effect
			Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no Ancient Woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Brome Hall Lane', 'Stratford on Avon Canal', 'Brome Hall Bridge Marsh', 'River Alne', 'Turners End Marsh', 'Grand Union Canal', 'Turners End Farm (North)', 'Baddesley Clinton Plantation', 'Canal Side' and 'Kingswood Farm Meadows' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'good quality semi-improved grassland'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.13.4 SA Objective 4: Landscape

Table C.13.4: The assessment of this small settlement location at 'Kingswood' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	KINGSWOOD: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 28.7km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Ancient Arden and Arden Pastures local character areas. Ancient Arden is characterised by a small scale farmed landscape with a varied, undulating topography, characterised by an irregular pattern of fields and narrow winding lanes. Arden Pastures is characterised by a small scale, enclosed landscape, often pervaded by suburban influences and characterised by small fields, typically bordered by mature hedgerow trees. The small settlement location could be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>

Score	SA4: Receptor	Mitigation potential	KINGSWOOD: Description of effect
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This small settlement location coincides with various PRoW. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.13.5 SA Objective 5: Cultural Heritage

Table C.13.5: The assessment of the small settlement location at 'Kingswood' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	KINGSWOOD: Description of effect
0	Grade I Listed Building	-	Grade I Listed Building 'Baddesley Clinton House and Bridge over Moat' is located approximately 460m to the north west of this small settlement location. As the Grade I Listed Building is separated by a wooded area, a negligible impact could be expected on the settings of the buildings and on local cultural heritage.
0	Grade II* Listed Building	-	Not in close proximity to a Grade II* Listed Building.
-	Grade II Listed Building	A/M	One Grade II Listed Building, 'Brome Hall Bridge (Number 38), Stratford upon Avon Canal' coincides with the small settlement location for development around the small settlement of Kingswood. There are also a number of Grade II Listed Buildings within Kingswood itself. These include, 'Lock Keepers Cottage Approximately 50 metres South-East of Lock 21, Stratford upon Avon', 'Lock 20, Stratford upon Avon Canal', 'Lock keepers House Approximately 4 metres East of Lock 21, Stratford upon Avon', 'Kingswood Farmhouse' and 'Mill House'. There is potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: Ensure the sensitive design, layout and location of development.</i>
-	Registered Parks and Gardens	A/M	The small settlement location for development around Kingswood is located approximately 260m, across open fields, from 'Baddesley Clinton Hall' RPG. A minor negative impact upon its setting could be expected due to the proximity to the RPG. <i>Mitigation: Avoid impacts through the sensitive location and layout of future development proposals.</i>
0	Conservation Area	-	Not in close proximity to a Conservation Area.
0	Scheduled Monument	-	SM 'Baddesley Clinton House and Bridge over Moat' is located approximately 460m from the proposed location for development. As the SM is separated by a wooded area, a negligible impact could be expected on the settings of the SM and on local cultural heritage.

C.13.6 SA Objective 6: Pollution

Table C.13.6: The assessment of the small settlement location at 'Kingswood' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	KINGSWOOD: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
-	Railway Line	A/M	The Chiltern Main Line runs through the centre of Kingswood and this small settlement location for development. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The River Dene flows through the centre of Kineton and this small settlement location for development. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.13.7 SA Objective 7: Natural Resources

Table C.13.7: The assessment of the small settlement location at 'Kingswood' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	KINGSWOOD: Description of effect
--	Agricultural Land Classification	M/X	This small settlement location is wholly located on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	This small settlement location wholly lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.13.8 SA Objective 8: Waste

Table C.13.8: The assessment of the small settlement location at 'Kingswood' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	KINGSWOOD: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could

Score	SA8: Receptor	Mitigation potential	KINGSWOOD: Description of effect
			potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.13.9 SA Objective 9: Housing

Table C.13.9: The assessment of the small settlement location at 'Kingswood' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	KINGSWOOD: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.13.10 SA Objective 10: Health

Table C.13.10: The assessment of the small settlement location at 'Kingswood' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	KINGSWOOD: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 10.1km east of the small settlement location. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Improving public transport services will improve access to these services.</i>
++	Access to GP Surgery	-	Majority of the small settlement location located within 800m of a GP surgery.
-	Access to Leisure Facilities	M	The small settlement location is situated approximately 10.5km away from the 'Meadow Community Sports Centre'. Therefore, the Small Settlement is located outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
+	Main Road	-	Small settlement location is located over 200m from a main road.
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle network. A minor positive impact on health and wellbeing is expected.

C.13.11 SA Objective 11: Accessibility

Table C.13.11: The assessment of the small settlement location at 'Kingswood' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	KINGSWOOD: Description of effect
+	Bus Stop	-	A proportion of this small settlement location is situated within the target distance to regular bus services and therefore a minor positive impact on accessibility is expected.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
0	Connectivity	-	Connectivity around Kingswood varies. Some areas to the north are identified as having good connectivity (Grade B). Other areas, particularly to the south are identified as having moderate connectivity to the village centre (Grade C) as well as very small areas to the east with poor (Grade D) and the south with very poor (Grade E). A negligible impact on transport and connectivity could be expected overall.
-	Local Services	M	Areas of this small settlement location are situated outside the sustainable target distance of local services and therefore a minor negative impact upon accessibility is expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.13.12 SA Objective 12: Education

Table C.13.12: The assessment of the small settlement location at 'Kingswood' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	KINGSWOOD: Description of effect
+	Access to Primary School	-	The small settlement location is situated within 800m of a primary school therefore a minor positive impact would be expected.
-	Access to Secondary School	M	A minor negative impact can be expected as the majority of this small settlement location is outside the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	This small settlement location is situated wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.13.13 SA Objective 13: Economy

Table C.13.13: The assessment of the small settlement location at 'Kingswood' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	KINGSWOOD: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to one employment opportunity, A minor positive impact on the local economy could be expected. However due to the limited number of employment opportunities this positive impact will be very small.

C.14 Long Itchington

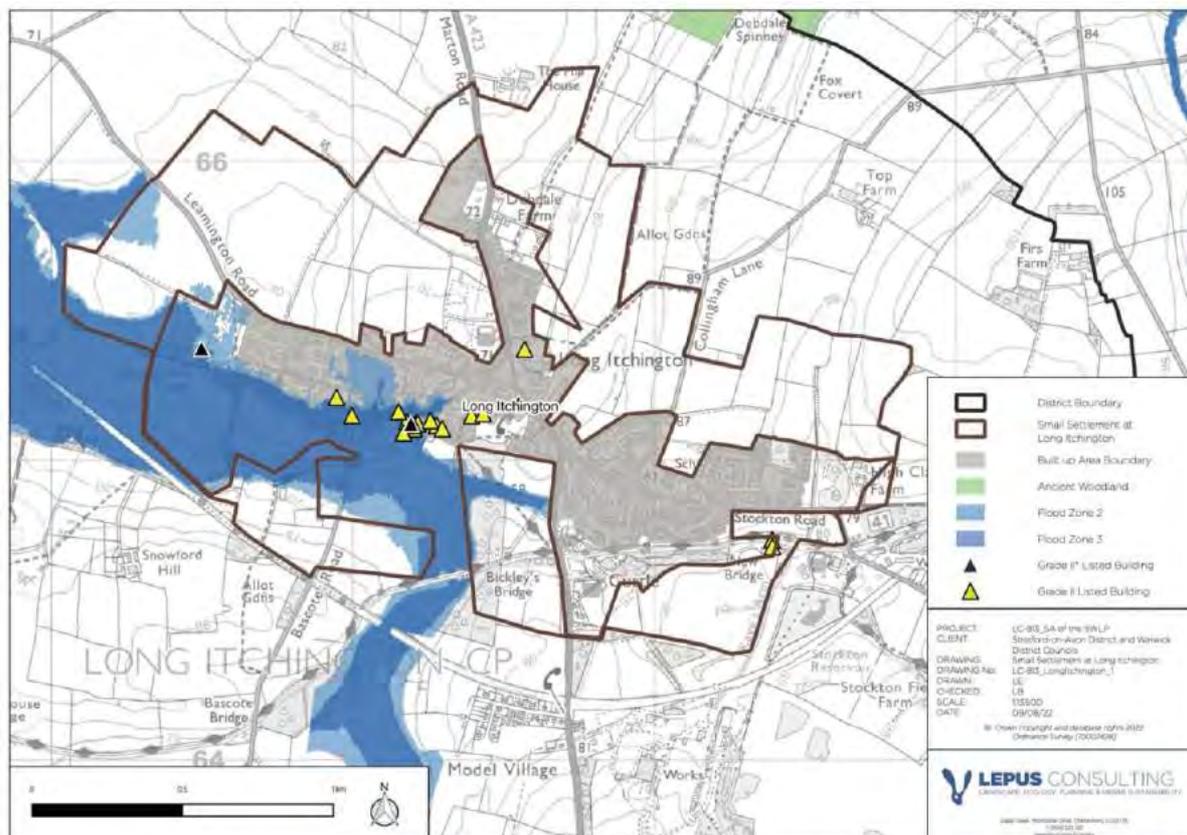


Figure C.14.1: Small settlement at Long Itchington with selected constraints

C.14.1 SA Objective 1: Climate Change

Table C.14.1: The assessment of the small settlement location at ‘Long Itchington’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.14.2 SA Objective 2: Flood Risk

Table C.14.2: The assessment of the small settlement locations at 'Long Itchington' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
0	Flood Zones	A/M	The majority of land at the proposed location at Long Itchington lies in Flood Zone 1, the lowest risk of fluvial flooding. A small proportion of land to the west of the location, associated with the floodplain of the River Itchen, lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.14.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.14.3: The assessment of the small settlement location at 'Long Itchington' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	Located approximately 270m from a stand of ancient woodland 'Debdale Wood and Spinney' with connections between these features on PRoW. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure. <i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Morton Road Meadows', 'Ruby's Meadow', 'River Itchen', 'Lias Line', 'Grand Union Canal', 'Stockton Locks Quarry' and 'Land Near Stockton Lock' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.

Score	SA3: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.14.4 SA Objective 4: Landscape

Table C.14.4: The assessment of the proposed location at 'Long Itchington' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 15.4km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Lias Village Farmlands and Vale Farmlands local character areas. Lias Village Farmlands is characterised by a varied small scale, hedged landscape of scattered farms and nucleated brick and stone villages. Vale Farmlands is characterised by a flat, open, hedged landscape with few roads or settlements and characterised by wide views to rising ground on one or more sides. The south eastern and north western sections of this location are identified as enhancement zones and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This small settlement location coincides with various PRoW. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.14.5 SA Objective 5: Cultural Heritage

Table C.14.5: The assessment of the small settlement location at 'Long Itchington' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
-	Grade II* Listed Building	A/M	There are three Grade II* Listed Buildings within Long Itchington including, 'White Hall Farmhouse', 'Church of the Holy Trinity' and 'Tudor House'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings within Long Itchington, in particular associated with Church Road. The 'Grand Union Canal, Cottage, Shop Lock', 'Grand Union Canal, Shop Lock approximately 7 metres North of Cottage Number 221' and 'The Red House' are located on the outskirts of Long Itchington and therefore in closer proximity to the small settlement location for development. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	A/M	Not in close proximity to a RPG.
-	Conservation Area	A/M	The 'Long Itchington' CA covers the centre of Long Itchington around which the small settlement location for development lies. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.14.6 SA Objective 6: Pollution

Table C.14.6: The assessment of the small settlement location at 'Long Itchington' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A423 runs through the centre of this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The River Itchen flows through the south western section of this small settlement location in a northerly direction. The Grand Union Canal also passes in a west to east direction through the southern section of this location. There is potential for minor negative impacts on these watercourses

Score	SA6: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
			from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.14.7 SA Objective 7: Natural Resources

Table C.14.7: The assessment of the small settlement location at 'Long Itchington' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
--	Agricultural Land Classification	M/X	Just over half of this small settlement location is situated on ALC Grade 3 land with the other half located upon ALC Grade 2 and a small proportion to the south located on Grade 4 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversable uses.</i>
-	Mineral Safeguarding Area	M/X	This small settlement location wholly lies within a MSA, where consultation is required. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversable uses.</i>

C.14.8 SA Objective 8: Waste

Table C.14.8: The assessment of small settlement location at 'Long Itchington' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.14.9 SA Objective 9: Housing

Table C.14.9: The assessment of this small settlement location at 'Long Itchington' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.14.10 SA Objective 10: Health

Table C.14.10: The assessment of the small settlement location at 'Long Itchington' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 11.5km west of the proposed small settlement location. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Improving public transport services will improve access to these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the small settlement location is situated outside of the target distance to GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	This small settlement location is situated approximately 2.2km away from 'Southam Leisure Centre and Swimming Pool' and therefore outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A negative impact on air quality and noise pollution could be expected as the A423 runs through 'Long Itchington', as well as the area for potential development. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle network. A minor positive impact on health and wellbeing is expected.

C.14.11 SA Objective 11: Accessibility

Table C.14.11: The assessment of the small settlement location at 'Long Itchington' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
+	Bus Stop	-	A minor negative impact could be expected as the small settlement location is partially situated inside the target distance of a bus stop providing regular services.

Score	SA11: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
-	Railway Station	M	A minor negative impact could be expected as the majority of the small settlement location is situated outside the target distance of a railway station providing regular services. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
+	Connectivity	-	Connectivity around Long Itchington varies. A fair proportion of the areas are identified as having good connectivity (Grade B). Other areas, particularly to the South-East and east are identified as having moderate connectivity to the village centre (Grade C) as well as areas to the South-West with poor connectivity (Grade D). A minor positive impact is possible for transport and access.
+	Local Services	-	A large proportion of this small settlement location is situated within the sustainable target distance of local services therefore a minor positive impact on accessibility is expected.

C.14.12 SA Objective 12: Education

Table C.14.12: The assessment of the small settlement location at 'Long Itchington' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
+	Access to Primary School	-	This small settlement location is situated within the sustainable target distance of a primary school.
-	Access to Secondary School	M	A minor negative impact can be expected as the majority of this small settlement location is situated outside the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	This small settlement location is situated wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.14.13 SA Objective 13: Economy

Table C.14.13: The assessment of the small settlement location at 'Long Itchington' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	LONG ITCHINGTON: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities. A minor positive impact on economic opportunities for future residents could be expected.

C.15 Radford Semele

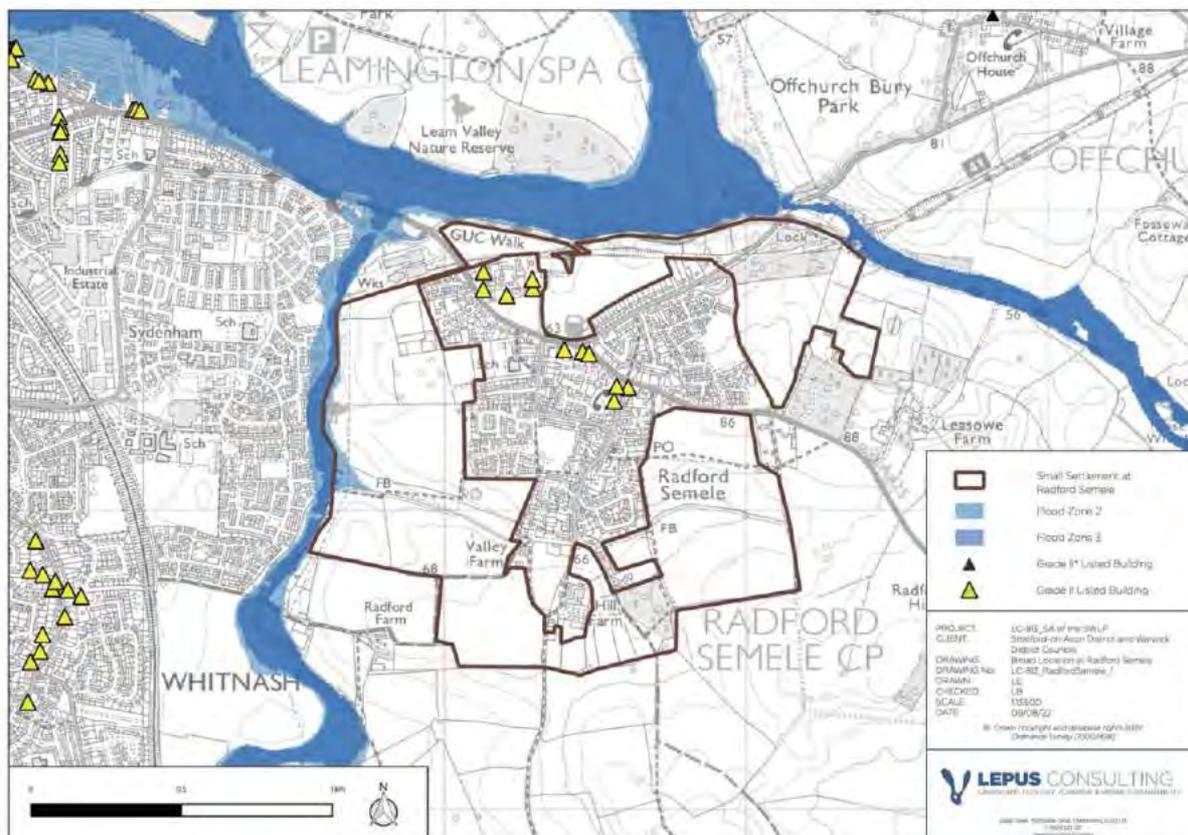


Figure C.15.1: Small settlement at Radford Semele with selected constraints

C.15.1 SA Objective 1: Climate Change

Table C.15.1: The assessment of the small settlement location at ‘Radford Semele’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.15.2 SA Objective 2: Flood Risk

Table C.15.2: The assessment of the small settlement location at 'Radford Semele' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
0	Flood Zones	A/M	The majority of land at the small settlement location at Radford Semele lies in Flood Zone 1, the lowest risk of fluvial flooding. A very small proportion of land at this location to its north and west, associated with the River Leam, lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.15.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.15.3: The assessment of the small settlement location at 'Radford Semele' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
-	LNRs	A	A minor negative impact on LNRs could be expected as 'Whitnash Brook' LNR is located adjacent to this small settlement location and 'Leam Valley' LNR is located approximately 20m from this small settlement location. <i>Mitigation: Avoid impacts through the location and layout of future proposals</i>
-	LWSs	A/M	Partially coincides with 'Grand Union Canal', 'Woodland adjacent to Grand Union Canal', 'Whitnash Brook' and 'The Valley' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland', 'Coastal and

Score	SA3: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
			floodplain grazing marsh' and 'traditional orchard'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.15.4 SA Objective 4: Landscape

Table C.15.4: The assessment of the small settlement location at 'Radford Semele' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 14.9km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Dunsmore Character Area and within the Plateau Fringe local character area. Plateau Fringe is characterised by a variable, often large-scale farmed landscape with a varied undulating topography and a nucleated settlement pattern of small often shrunken villages. This location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with, and is adjacent to, two PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	A minor negative impact could be expected as development at this small settlement location could increase the risk of coalescence with 'Royal Leamington Spa'. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

C.15.5 SA Objective 5: Cultural Heritage

Table C.15.5: The assessment of the small settlement location at 'Radford Semele' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
0	Grade II* Listed Building	-	Not in close proximity to a Grade II* Listed Building.
-	Grade II Listed Building	A/M	A number of Grade II Listed Buildings are located within Radford Semele, features such as 'Radford Hall', 'Parish of Saint Nicholas' and 'Churchyard Boundary Wall and Lychgate to South of Church' are located in close proximity to the area for potential development around this small settlement. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
0	Conservation Area	-	Not in close proximity to a Conservation Area.
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.15.6 SA Objective 6: Pollution

Table C.15.6: The assessment of the small settlement location at 'Radford Semele' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A425 runs through the centre of this small settlement location. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The River Leam and the Grand Union Canal flow along the northern boundary of this small settlement location. The Whitnash Brook (a tributary of the River Leam) flows in a northerly direction along the western boundary of this small settlement location. There is potential for minor negative impacts on these watercourses from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.15.7 SA Objective 7: Natural Resources

Table C.15.7: The assessment of the small settlement location at 'Radford Semele' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
--	Agricultural Land Classification	M/X	A large proportion of this small settlement location is located on ALC Grade 3 land and smaller parts of the area of search are located upon ALC Grade 4 and 'urban' land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	This small settlement location lies within a MSA, where consultation is required. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.15.8 SA Objective 8: Waste

Table C.15.8: The assessment of the small settlement location at 'Radford Semele' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development of the small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.15.9 SA Objective 9: Housing

Table C.15.9: The assessment of the small settlement location at 'Radford Semele' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.15.10 SA Objective 10: Health

Table C.15.10: The assessment of the small settlement location at 'Radford Semele' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 5.2km north-west of the small settlement location. This lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	Located partially within target distance of GP surgery.
+	Access to Leisure Facilities	-	Located partially within target distance of leisure facilities.
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	A/M	A negative impact on air quality and noise pollution could be expected as the A425 runs through the centre of this small settlement location and poses a potential source of pollution. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	The majority of the small settlement location is situated within the target distance to the PRow and cycle network. A minor positive impact on the health and wellbeing is expected.

C.15.11 SA Objective 11: Accessibility

Table C.15.11: The assessment of the small settlement location at 'Radford Semele' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
+	Bus Stop	-	A minor negative impact could be expected as the small settlement location is partially situated inside the target distance of a bus stop providing regular services.
-	Railway Station	M	A minor negative impact could be expected as the majority of this small settlement location is situated outside the target distance of a railway station providing regular services. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Connectivity	M	Connectivity around Radford Semele varies. Some areas to the north and South-East are identified as having very good connectivity (Grade A). Other areas, particularly to the south and east are identified as lacking in connectivity to the village centre (Grade D) with a small area to the North-East identified as having moderate connectivity (Grade C). Without mitigation, development in less accessible areas may lead to a minor negative impact on transport and access. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
+	Local Services	-	A large proportion of this small settlement location is situated within the sustainable target distance of local services and therefore a minor positive impact on accessibility is expected.

C.15.12 SA Objective 12: Education

Table C.15.12: The assessment of the small settlement location at 'Radford Semele' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
+	Access to Primary School	-	This small settlement location is situated within 800m of a primary school therefore a minor positive impact would be expected.
+	Access to Secondary School	-	A significant proportion of the small settlement location is situated within 1.5km of a secondary school therefore a minor positive impact would be expected.
+	Access to Further Education	-	This small settlement location is situated wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.15.13 SA Objective 13: Economy

Table C.15.13: The assessment of the small settlement location at 'Radford Semele' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	RADFORD SEMELE: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises mostly undeveloped land, apart from 'Hill Farm' in the South of the Small Settlement and is not likely to result in a large loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within Royal Leamington Spa. A minor positive impact on economic opportunities for local residents could be expected.

C.16 Salford Priors

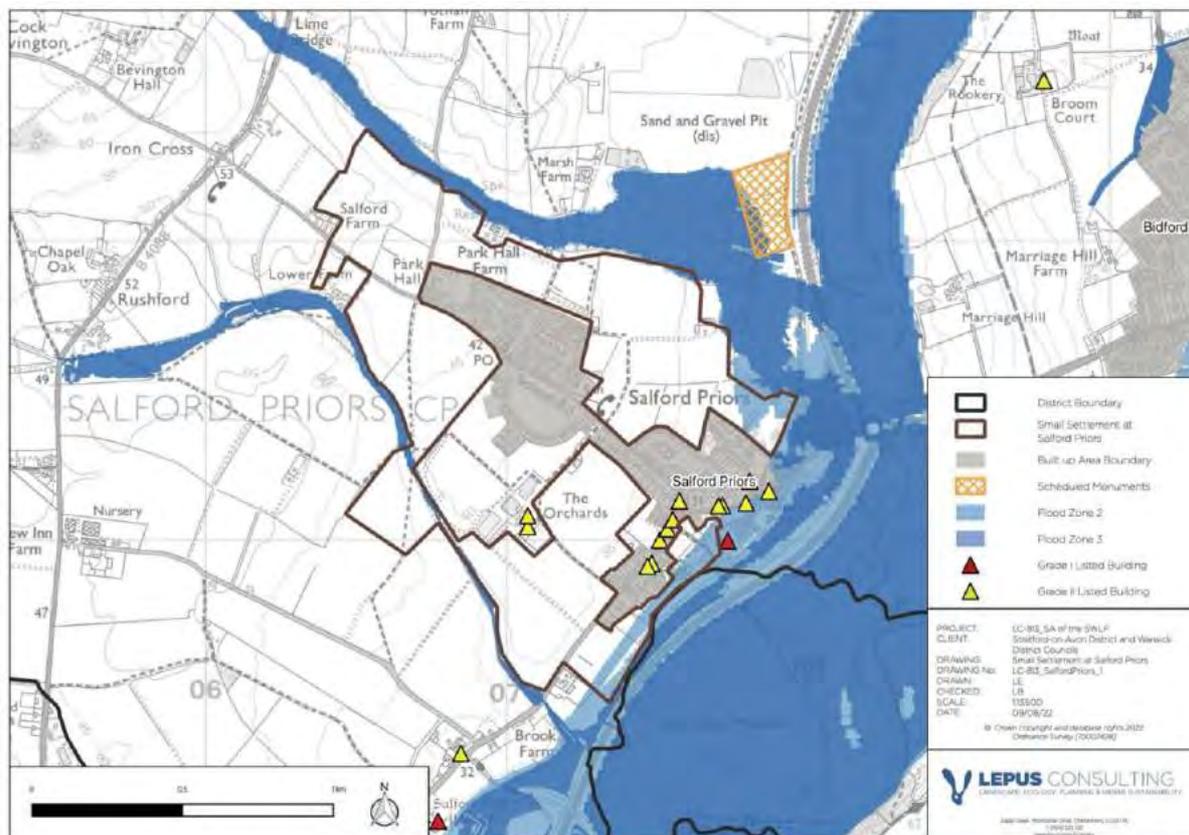


Figure C.16.1: Small settlement at Salford Priors with selected constraints

C.16.1 SA Objective 1: Climate Change

Table C.16.1: The assessment of the small settlement location at ‘Salford Priors’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.16.2 SA Objective 2: Flood Risk

Table C.16.2: The assessment of the small settlement location at 'Salford Priors' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
0	Flood Zones	A/M	The majority of land at the small settlement location at Salford Priors lies in Flood Zone 1, the lowest risk of fluvial flooding. A very small proportion of land around the boundaries of this location, associated with the River Arrow and its tributaries, lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are small, scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.16.3 A Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.16.3: The assessment of this small settlement location at 'Salford Priors' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixon Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the location.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'River Arrow', 'Worcester Meadows North', 'Avon Tributary nr. Salford Priors' and 'Salford Priors Churchyard' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland'. There is potential for minor negative impacts on priority habitats.

Score	SA3: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
			<i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.16.4 SA Objective 4: Landscape

Table C.16.4: The assessment of the small settlement location at 'Salford Priors' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 10.1km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Avon Character Area and within the Terrace Farmlands local character area. Terrace Farmlands is characterised by a flat, open, intensively farmed landscape, with market gardening, on fertile river terrace soils. This south western area of this location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.16.5 SA Objective 5: Cultural Heritage

Table C.16.5: The assessment of the small settlement location at 'Salford Priors' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
-	Grade I Listed Building	A/M	There is one Grade I Listed Building 'Church of St Matthew' located adjacent to the area for potential development around Salford Priors. There is the potential for minor negative impacts on the settings of this heritage asset. <i>Mitigation: It is likely that impacts on the setting of this asset could be avoided through the layout and design of the proposals.</i>
0	Grade II* Listed Building	-	Not in close proximity to a Grade II* Listed Building.
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings which are located within the smaller settlement of Salford Priors and which are visible from the small settlement location for development, including, 'The Orchards', 'The Orchards, Barn approximately 35 metres North of House', 'Godiva Cottage', 'Cottage approximately 15 metres South of Periwinkle Cottage' and 'Victoria Cottage'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
-	Conservation Area	A/M	The 'Salford Priors' CA follows Station Road within Salford Priors. A small area of it is coincident with the area suggested for potential development. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
-	Scheduled Monument	A	The SM 'Encloses ¾ mile (1200m) N of Salford Priors' lies approximately 220m to the north east of the small settlement location for development. A minor negative impact on the settings of this SM could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

C.16.6 SA Objective 6: Pollution

Table C.16.6: The assessment of the small settlement location at 'Salford Priors' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A46 runs along the eastern boundary of this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.

Score	SA6: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
-	Watercourse	M	The Ban Brook flows along the northern boundary of this small settlement location before converging with the River Arrow and subsequently the River Avon to the east of Salford Priors. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.16.7 SA Objective 7: Natural Resources

Table C.16.7: The assessment of the small settlement location at 'Salford Priors' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
--	Agricultural Land Classification	M/X	This small settlement location is wholly situated on ALC Grade 2 land. There is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	This small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.16.8 SA Objective 8: Waste

Table C.16.8: The assessment of the small settlement location at 'Salford Priors' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.16.9 SA Objective 9: Housing

Table C.16.9: The assessment of the small settlement location at 'Salford Priors' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.16.10 SA Objective 10: Health

Table C.16.10: The assessment of the small settlement location at 'Salford Priors' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Alexandra Hospital', approximately 12.2km north of the small settlement location at 'Salford Priors'. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Improving public transport services will indirectly benefit access to these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the small settlement location is situated outside of the target distance to GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	The small settlement location at 'Salford Priors' is situated approximately 6km away from 'Hannah Susan Greig Memorial Hall'. Minor adverse effect likely. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A46 runs along the eastern boundary of this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	Located within target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

C.16.11 SA Objective 11: Accessibility

Table C.16.11: The assessment of the small settlement location at 'Salford Priors' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
-	Railway Station	M	A minor negative impact could be expected as the majority of this small settlement location is situated outside the target distance of a railway station providing regular services. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	Connectivity	-	Connectivity around Salford Priors varies. Areas to the south and west are identified as having good connectivity (Grade B). Other areas, particularly to the north are identified as having moderate connectivity to the village centre (Grade D). A negligible impact on transport and connectivity could be expected overall.
-	Local Services	M	This small settlement location is situated outside the sustainable target distance to local services. A minor negative impact on accessibility is expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.16.12 SA Objective 12: Education

Table C.16.12: The assessment of the small settlement location at 'Salford Priors' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
+	Access to Primary School	-	This small settlement location is situated within 800m of a primary school therefore a minor positive impact would be expected.
-	Access to Secondary School	M	The entirety of this small settlement location is situated outside of the 1.5km of a secondary school therefore a minor negative impact would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Further Education	M	This small settlement location is situated wholly outside the target distance to post-16 (further) education. A minor negative impact on access to these educational facilities would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.16.13 SA Objective 13: Economy

Table C.16.13: The assessment of the small settlement location at 'Salford Priors' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to one employment opportunity, A minor positive impact on the local economy could be expected. However due to the limited number of

Score	SA13: Receptor	Mitigation potential	SALFORD PRIORS: Description of effect
			employment opportunities this positive impact will be very small.

C.17 South Coventry

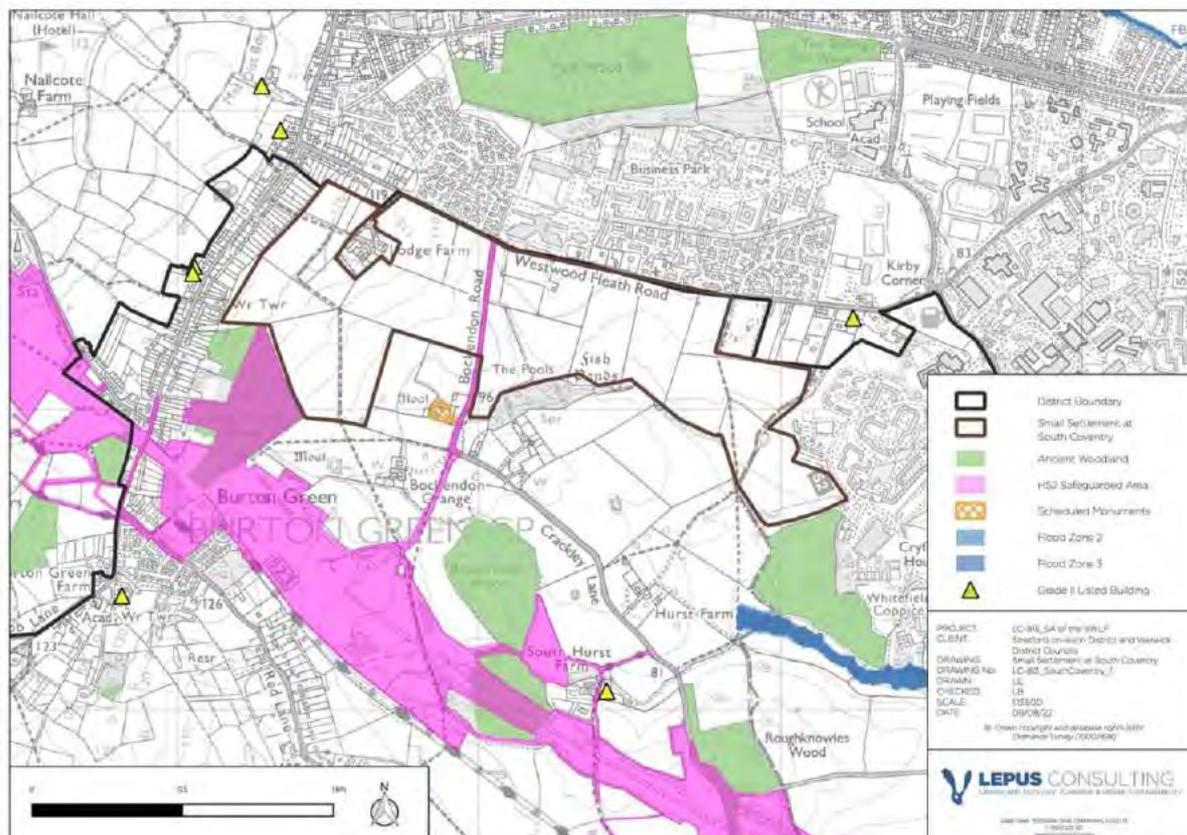


Figure C.17.1: Small settlement at South Coventry with selected constraints

C.17.1 SA Objective 1: Climate Change

Table C.17.1: The assessment of the small settlement location at ‘South Coventry’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.17.2 SA Objective 2: Flood Risk

Table C.17.2: The assessment of the small settlement location at 'South Coventry' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
+	Flood Zones	-	This small settlement location is located wholly within Flood Zone 1
+	Surface Water Flood Risk	-	There are no recorded areas of low, medium and high SWFR across the small settlement location.

C.17.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.17.3: The assessment of the small settlement location at 'South Coventry' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
+/-	Habitats Sites	-	An HRA is currently being undertaken alongside the development of the Local Plan. This will explore hydrological impacts, recreational impacts and impacts upon areas of functionally linked land at a number of Habitats sites. These include Bredon Hill SAC, Ensor's Pools SAC, Lyppard Grange Ponds SAC, Dixton Woods SAC, Oxford Meadows SAC, Severn Estuary SAC, SPA and Ramsar and the Humber Estuary SAC, SPA and Ramsar. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	A minor negative impact could be expected as the ancient woodlands 'Black Waste Wood' and 'Whitefield Coppice' are located adjacent to the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'The Pools Wood', 'Black Waste Wood' and 'Bockendon Grange Pond' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are partially located in the area of search including, 'deciduous woodland'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.17.4 SA Objective 4: Landscape

Table C.17.4: The assessment of the small settlement location at 'South Coventry' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 27.9km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Arden Parklands local character area. Arden Parklands is characterised by an enclosed, gently rolling landscape defined by woodland edges, parkland and belts of trees. The small settlement location could be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
0	Special Landscape Areas	-	Location does not coincide with a SLA.
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This proposed location coincides with various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	Development at this small settlement location could lead to coalescence with Burton Green.

C.17.5 SA Objective 5: Cultural Heritage

Table C.17.5: The assessment of the small settlement location at 'South Coventry' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
0	Grade II* Listed Building	-	Not in close proximity to a Grade II* Listed Building.
-	Grade II Listed Building	A/M	The area with potential for development around South Coventry is located in close proximity to a number of Grade II Listed Buildings on the outskirts of Coventry, 'Church of St John the Baptist' has potential to be visible from the potential development location. There is the potential for minor negative impacts on the settings of this heritage asset. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.

Score	SA5: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
0	Conservation Area	-	Not in close proximity to a Conservation Area.
-	Scheduled Monument	A	The 'Medieval moated site of Bockenden Grange' SM is located approximately 37m to the south west of this small settlement location. A minor negative impact on the settings of this SMs could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

C.17.6 SA Objective 6: Pollution

Table C.17.6: The assessment of small settlement location at 'South Coventry' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
-	AQMA	A/M	'Coventry City-Wide AQMA' is coincident with the northern section of this small settlement location for development. Development within an AQMA could potentially expose end users to higher levels of transport related air pollution with adverse impacts upon human health. A minor negative impact has therefore been identified. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals away from areas designated within the AQMA. Mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles. Undertake air quality assessment and traffic assessment to ensure the objectives of the Local Air Quality Action Plan can be delivered.</i>
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
0	Watercourse	-	There are no watercourses within 200m of this small settlement location.
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.17.7 SA Objective 7: Natural Resources

Table C.17.7: The assessment of the small settlement location at 'South Coventry' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
--	Agricultural Land Classification	M/X	A large proportion of this small settlement location is situated on ALC Grade 2 land with smaller areas located upon ALC Grade 3 and 'urban' land. There is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversable uses.</i>
0	Mineral Safeguarding Area	-	This small settlement location does not coincide with an MSA.

C.17.8 SA Objective 8: Waste

Table C.17.8: The assessment of the small settlement location at 'South Coventry' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
-	Potential increase in household waste generation	M	<p>Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 68 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Warwick. A minor negative impact on waste could be expected upon development of the small settlement location.</p> <p><i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i></p>

C.17.9 SA Objective 9: Housing

Table C.17.9: The assessment of the small settlement location at 'South Coventry' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
++	Housing provision	-	<p>For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.</p>

C.17.10 SA Objective 10: Health

Table C.17.10: The assessment of the small settlement location at 'South Coventry' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
-	NHS Hospital with A&E Department	M	<p>The nearest hospital with A&E services is 'Warwick Hospital', approximately 10km south of the small settlement location. This location lies outside the sustainable distance to access A&E services.</p> <p><i>Mitigation: Improving public transport services will indirectly benefit access to these services.</i></p>
-	Access to GP Surgery	M	<p>Outside of the target distance for a GP surgery. Nearest location is 1.8km away at Forrest Medical Centre.</p> <p><i>Mitigation: Ensure provision of regular active and public transport links to key services and facilities.</i></p>
++	Access to Leisure Facilities	-	<p>The small settlement location is situated within close proximity to Warwick University Sports Centre, with the majority of the settlement within the target distance. A major positive impact would be expected.</p>
-	AQMA	A/M	<p>'Coventry City-Wide' AQMA is coincident with this small settlement location. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact has therefore been identified.</p> <p><i>Mitigation: Avoid impacts through the location, design and layout of future proposals away from areas designated within the AQMA. Mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles. Undertake air quality assessment and traffic assessment to ensure the objectives of the Local Air Quality Action Plan can be delivered.</i></p>

Score	SA10: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
+	Main Road	-	This location is situated over 200m from a main road.
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	This small settlement location is situated within the target distance of a PRoW and cycle network. A minor positive impact on health and wellbeing is expected.

C.17.11 SA Objective 11: Accessibility

Table C.17.11: The assessment of the small settlement location at 'South Coventry' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
+	Bus Stop	-	Areas of this small settlement location are within the target distance to a bus stop providing regular services and therefore a minor positive impact on accessibility is expected.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
+	Connectivity	-	A large proportion of this small settlement location lies within an area identified as having good connectivity to the existing settlement (Grade B) with a small area to the South-West identified as having moderate connectivity (Grade C). A minor positive impact on transport could be expected.
-	Local Services	M	This small settlement location is situated outside the sustainable target distance to local services and therefore a minor negative impact on accessibility is expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.17.12 SA Objective 12: Education

Table C.17.12: The assessment of the small settlement location at 'South Coventry' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
-	Access to Primary School	M	A minor negative impact can be expected as the majority of this location is situated outside the sustainable target distance of any primary schools. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Secondary School	M	The entirety of this small settlement location is situated outside of the 1.5km target distance of a secondary school. Consequently, a minor negative impact would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Further Education	M	The entirety of this small settlement location is situated is located outside of the target distance for further education. Consequently, a minor negative impact would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.17.13 SA Objective 13: Economy

Table C.17.13: The assessment of the small settlement location at 'South Coventry' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	SOUTH COVENTRY: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to one employment opportunity. A minor positive impact on the local economy could be expected. However due to the limited number of employment opportunities this positive impact will be very small.

C.18 Studley

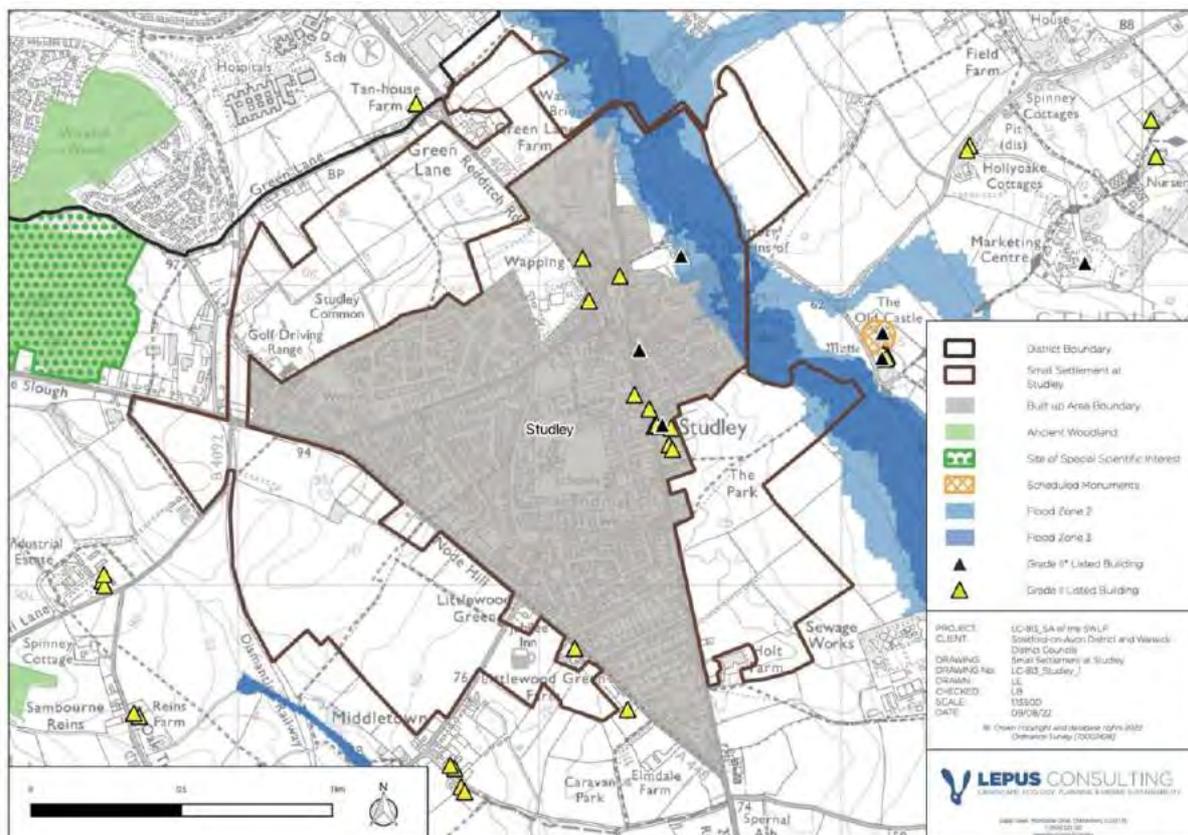


Figure C.18.1: Small settlement at Studley with selected constraints

C.18.1 SA Objective 1: Climate Change

Table C.18.1: The assessment of the small settlement location at ‘Studley’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	STUDLEY: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.18.2 SA Objective 2: Flood Risk

Table C.18.2: The assessment of the small settlement location at 'Studley' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	STUDLEY: Description of effect
0	Flood Zones	A/M	The majority of land at the small settlement location at Studley lies in Flood Zone 1, the lowest risk of fluvial flooding. A strip of land through the north eastern corner of the location (associate with the River Arrow and its tributaries) lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.18.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.18.3: The assessment of the small settlement location at 'Studley' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	STUDLEY: Description of effect
+/-	Habitats Sites	-	The plan area is hydrologically connected to several Habitats sites, including those associated with the Severn and Humber Estuaries and Oxford Meadows SAC. There is also the potential for watercourses within the plan area to be functionally linked to the Severn Estuary SAC and Ramsar site and the Humber Estuary SAC and Ramsar site due to the role they play in the life-cycle of qualifying species of fish. The HRA will focus on recreational impacts, hydrological impacts (water quality and quantity) and impacts upon functionally linked land as the SWLP develops. The HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
-	SSSIs	A	A minor negative impact could be expected as 'Rough Hill & Wirehill Wood' SSSI is located approximately 129m from this small settlement location. A small proportion of the location coincides with a SSSI IRZ which requires consultation for residential development for 50 units or more, or 10 units or more outside existing settlements / urban areas. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	Located approximately 103m from a stand of ancient woodland 'Wirehill Wood'. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure, as well as noise and light pollution. <i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs in proximity to the location.

Score	SA3: Receptor	Mitigation potential	STUDLEY: Description of effect
-	LWSs	A/M	Partially coincides with 'Dismantled Railway', 'Brickyard Lane', 'Studley Common Fields', 'River Arrow' and 'Wood at Studley Bridge' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	LGSs	-	Slightly coincides with 'River Arrow, Studley' LGS. A minor negative impact on this LGS could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland' and 'coastal and floodplain grazing marsh'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.18.4 SA Objective 4: Landscape

Table C.18.4: The assessment of the small settlement location at 'Studley' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	STUDLEY: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 18.7km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Character Area and within the Wooded Estatelands local character area. Wooded Estatelands is characterised by well wooded estate landscape characterised by a large-scale rolling topography and prominent hilltop woodlands. This location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	This small settlement location wholly coincides with 'Arden' SLA, where a small proportion of the overall SLA could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
-	Country Park	M	This small settlement location is situated approximately 165m from 'Arrow' Country Park. A minor negative impact on the setting of this CP could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Views from the PRow Network	M	This small settlement location coincides with various PRow. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>

Score	SA4: Receptor	Mitigation potential	STUDLEY: Description of effect
-	Coalescence	M	A minor negative impact could be expected as development at this small settlement location could increase the risk of coalescence with 'Redditch'. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

C.18.5 SA Objective 5: Cultural Heritage

Table C.18.5: The assessment of the small settlement location at 'Studley' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	STUDLEY: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
-	Grade II* Listed Building	A/M	There are a number of Grade II* Listed Buildings located within Studley itself along Alcester Road. In addition, there are two Grade II* Listed Buildings to the north east of Studley with possible views across the small settlement location for development. These include the 'Church of St Mary' and 'The Old Castle'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings located within Studley itself and to its north east which are potentially visible from the small settlement location for development. These include, 'Garden Wall approximately 4 metres East of Mountbatten House', 'Urn approximately 4 metres West of Entrance of Mountbatten House', 'Roman Catholic Church of St Mary', 'Presbytery, Roman Catholic Church of St Mary' and 'House at Spernal Ash Dairy'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
0	Conservation Area	-	Not in close proximity to a Conservation Area.
-	Scheduled Monument	A	The 'Studley Old Castle: a motte castle" SM is located approximately 115m to the north east of the small settlement location. A minor negative impact on the setting of this SMs could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

C.18.6 SA Objective 6: Pollution

Table C.18.6: The assessment of the small settlement location at 'Studley' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	STUDLEY: Description of effect
-	AQMA	M	The Studley AQMA is situated within the small settlement of Studley and therefore at its closest point is located within 104m of this small settlement location. Development close to an AQMA could potentially contribute to already elevated local levels of transport related air pollution with adverse impacts upon human health. A minor negative impact has therefore been identified. <i>Mitigation: Mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of</i>

Score	SA6: Receptor	Mitigation potential	STUDLEY: Description of effect
			<i>transport and provide electric charging infrastructure for vehicles. Undertake air quality assessment and traffic assessment to ensure the objectives of the Local Air Quality Action Plan for the adjacent AQMA can be delivered.</i>
-	Main Road	A/M	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The River Arrow (a tributary of the River Avon) flows through the north eastern section of this small settlement location and southwards along its eastern boundary. In addition, a tributary, the Coin Brook, flows in a southerly direction along the small settlement locations south western boundary. There is potential for minor negative impacts on these watercourses from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.18.7 SA Objective 7: Natural Resources

Table C.18.7: The assessment of the small settlement location at ‘Studley’ against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	STUDLEY: Description of effect
--	Agricultural Land Classification	M/X	This small settlement location is wholly situated on ALC Grade 3 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversable uses.</i>
-	Mineral Safeguarding Area	M/X	The majority of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversable uses.</i>

C.18.8 SA Objective 8: Waste

Table C.18.8: The assessment of the small settlement location at ‘Studley’ against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	STUDLEY: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of the small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the</i>

Score	SA8: Receptor	Mitigation potential	STUDLEY: Description of effect
			<i>waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.18.9 SA Objective 9: Housing

Table C.18.9: The assessment of the small settlement location at 'Studley' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	STUDLEY: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.18.10 SA Objective 10: Health

Table C.18.10: The assessment of the small settlement location at 'Studley' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	STUDLEY: Description of effect
++	NHS Hospital with A&E Department	-	A major positive impact on access to healthcare would be expected as this location is entirely within the target distance to 'Alexandra Hospital A&E'.
+	Access to GP Surgery	-	Small settlement location partially located within 800m of a GP surgery.
++	Access to Leisure Facilities	-	This small settlement location coincides entirely within the target distance of the 'Studley Leisure Centre'. Major likely positive effect on human health.
-	AQMA	A/M	The Studley AQMA is situated within the small settlement of Studley and therefore at its closest point is located within 104m of this small settlement location. Development close to an AQMA could potentially contribute to already elevated local levels of transport related air pollution with adverse impacts upon human health. A minor negative impact has therefore been identified. <i>Mitigation: Mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles. Undertake air quality assessment and traffic assessment to ensure the objectives of the Local Air Quality Action Plan for the adjacent AQMA can be delivered.</i>
-	Main Road	A/M	A minor negative impact on air quality and noise pollution could be expected as the A435 and A448 runs through the small settlement location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRoW / Cycle Path Networks	-	Located within target distance to a PRoW and cycle network. A minor positive impact on health and wellbeing is expected.

C.18.11 SA Objective 11: Accessibility

Table C.18.11: The assessment of the small settlement location at 'Studley' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	STUDLEY: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
-	Railway Station	M	A minor negative impact could be expected as the entirety of this small settlement location is situated outside the target distance to a railway station providing regular services. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
+	Connectivity	-	This small settlement location is situated within an area mostly identified as having moderate connectivity to the existing settlement (Grade C), with a proportion to the North-West within an area identified as having good connectivity (Grade B). A positive impact on transport and connectivity could be expected.
+	Local Services	-	A large proportion of this small settlement location is within the sustainable target distance to local services and therefore a minor positive impact on accessibility is expected.

C.18.12 SA Objective 12: Education

Table C.18.12: The assessment of the small settlement location at 'Studley' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	STUDLEY: Description of effect
+	Access to Primary School	-	A minor positive impact can be expected as most of this location is within the sustainable target distance of a primary school.
+	Access to Secondary School	-	A minor positive impact can be expected as most of this location is within the sustainable target distance of a secondary school.
-	Access to Further Education	M	The entirety of this small settlement location is situated outside of the target distance of further education. Consequently, a minor negative impact would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.18.13 SA Objective 13: Economy

Table C.18.13: The assessment of the small settlement location at 'Studley' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	STUDLEY: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to a few employment opportunities, a large proportion of which are within Studley. A minor positive impact on the local economy could be expected.

C.19 Wellesbourne

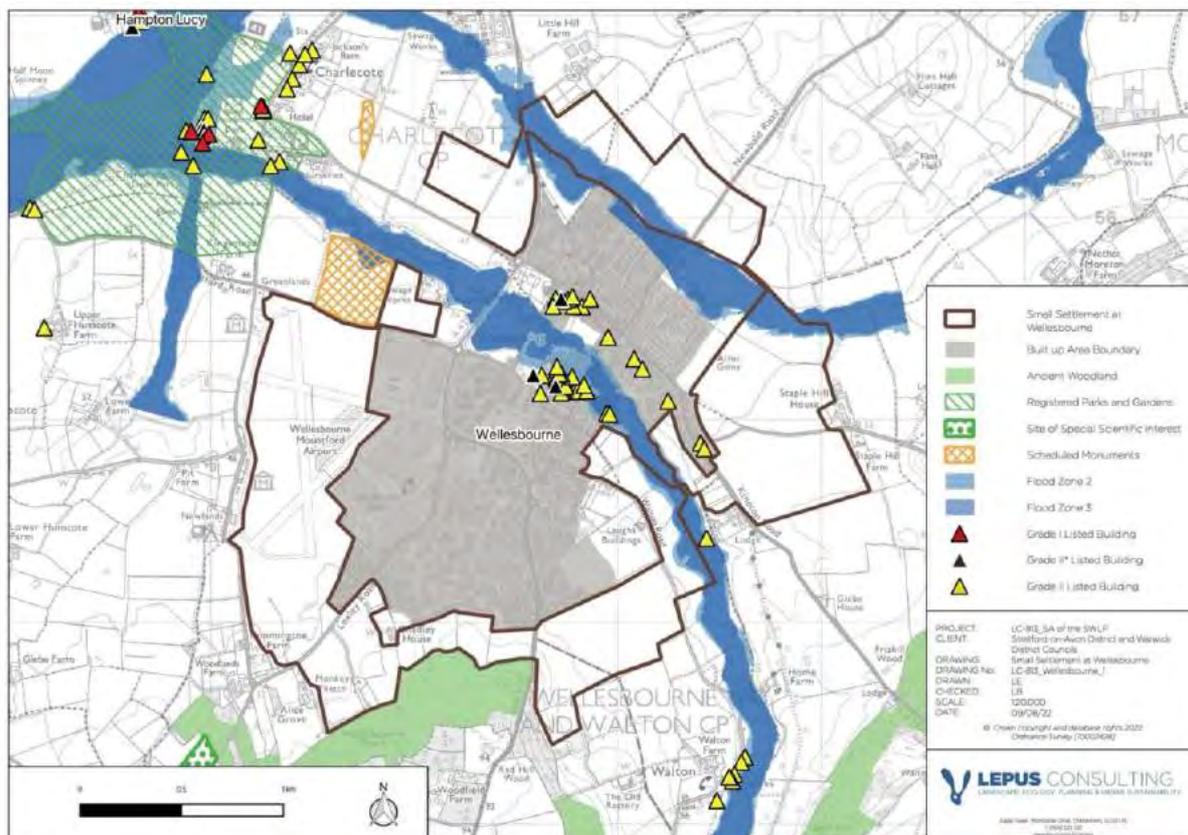


Figure C.19.1: Small settlement at Wellesbourne with selected constraints

C.19.1 SA Objective 1: Climate Change

Table C.19.1: The assessment of the small settlement location at ‘Wellesbourne’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.19.2 SA Objective 2: Flood Risk

Table C.19.2: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
0	Flood Zones	A/M	The majority of land at the proposed location at Wellesbourne lies in Flood Zone 1, the lowest risk of fluvial flooding. Two strips of land associated with the floodplains of the River Dene and River Avon run through the north eastern areas of this location. A small proportion of land along this location's boundaries lie in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.19.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.19.3: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
+/-	Habitats Sites	-	The plan area is hydrologically connected to several Habitats sites, including those associated with the Severn and Humber Estuaries and Oxford Meadows SAC. There is also the potential for watercourses within the plan area to be functionally linked to the Severn Estuary SAC and Ramsar site and the Humber Estuary SAC and Ramsar site due to the role they play in the life-cycle of qualifying species of fish. The HRA will focus on recreational impacts, hydrological impacts (water quality and quantity) and impacts upon functionally linked land as the SWLP develops. The HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
-	SSSIs	A	A minor negative impact could be expected as 'Loxley Church Meadow' SSSI is located approximately 499m from the Small Settlement. A small proportion of this small settlement location coincides with a SSSI IRZ which requires consultation for residential development for 100 units or more, or for 50 units or more outside existing settlements / urban areas. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A	A minor negative impact could be expected as the ancient woodland 'Wellesbourne Wood' is located immediately adjacent to the location. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LNRs	-	There are no LNRs in proximity to the location.

Score	SA3: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
-	LWSs	A/M	Partially coincides around its boundaries with 'Wellesbourne Woods', 'River Dene', 'Dene Valley' and 'River Avon and Tributaries' LWSs. Development in this location could have minor negative impacts on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.19.4 SA Objective 4: Landscape

Table C.19.4: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WELLSBOURNE: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 10.4km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Avon Valley Character Area and within the Terrace Farmlands local character area. Terrace Farmlands is characterised by a flat, open, intensively farmed landscape, with market gardening, on fertile river terrace soils. A large proportion of this location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	The southern boundary of this proposed location coincides with 'Dunsmore and Feldon' SLA, where a very small proportion of the overall SLA could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Avoid developing in Special Landscape Areas. Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	Coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area is unlikely to lead to the coalescence of settlements.

C.19.5 SA Objective 5: Cultural Heritage

Table C.19.5: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WELLSBOURNE: Description of effect
-	Grade I Listed Building	A/M	There are a number of Grade I Listed Buildings located to the north west of the small settlement location for development around Wellesbourne. These are associated with Charlecote Park and the small settlement location is visible from these. As such there are potential negative impacts upon the setting of these features. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
-	Grade II* Listed Building	A/M	There are three Grade II* Listed Buildings located within the centre of Wellesbourne including 'Church of St Peter', 'The Little House' and "Wellesbourne Hall'. There is the potential for negative impacts on the setting of these features. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings located within the center of Wellesbourne. A number of these may be visible from the small settlement location for development, including 'Staple Hill Cottages', 'Wellesbourne Mill and Mill House' and 'Wellesbourne Farmhouse'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
-	Registered Parks and Gardens	A/M	'Charlecote Park' RPG is located approximately 225m to the north west of this small settlement location. A minor negative impact could be expected on the setting of this RPG. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Conservation Area	A/M	'Wellesbourne' CA covers the centre of Wellesbourne around which the small settlement location for development is situated. There is the potential for minor negative impacts on the setting of this CA. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
-	Scheduled Monument	A	The 'Enclosures 600yds (550m) E of King's Mead' SM is located immediately adjacent to the small settlement location for development and 'Cursus and bowl barrow 450m South-East of Jackson's Barn" SM is located approximately 315m to its north west. A minor negative impact on the settings of these SMs could be expected. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

C.19.6 SA Objective 6: Pollution

Table C.19.6: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WELLSBOURNE: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A429 runs in a north – south direction through Wellsbourne and this small settlement location for development. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and</i>

Score	SA6: Receptor	Mitigation potential	WELLSBOURNE: Description of effect
			<i>enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
0	Railway Line	-	Not within 200m of a railway line.
-	Watercourse	M	The River Dene flows in a northerly direction through the centre of Wellesbourne before converging with the River Avon to the north west. In addition, another unnamed tributary of the River Avon flows through the north eastern section of this proposed location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.19.7 SA Objective 7: Natural Resources

Table C.19.7: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
--	Agricultural Land Classification	M/X	Approximately half the small settlement location is situated on ALC Grade 2 land, with a small proportion of land to the north east and south west located upon Grade 3 land. The remaining areas are located upon ALC Grade 4 and 'Urban' land. Therefore, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	This whole small settlement location is situated within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.19.8 SA Objective 8: Waste

Table C.19.8: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.19.9 SA Objective 9: Housing

Table C.19.9: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.19.10 SA Objective 10: Health

Table C.19.10: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WELLSBOURNE: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Warwick Hospital', approximately 9.1km north of 'Wellesbourne'. This location lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	Partially within target distance of a GP surgery.
++	Access to Leisure Facilities	-	Small settlement location is substantially coincident with the target distance to leisure facilities. Major positive effect on health.
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	A/M	A minor negative impact on air quality and noise pollution could be expected as the A429 runs through the centre of 'Wellesbourne' and small settlement location with the possibility for negative impacts upon future residents. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle network. A minor positive impact on health and wellbeing is expected.

C.19.11 SA Objective 11: Accessibility

Table C.19.11: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
+	Bus Stop	-	A minor positive impact could be expected as the majority of this small settlement location is situated within the target distance of a bus stop providing regular services.

Score	SA11: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
-	Railway Station	M	A minor negative impact could be expected as the majority of this small settlement location is situated outside the target distance to a railway station providing regular services. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Connectivity	M	This small settlement location is situated within an area mostly identified as having moderate connectivity to the existing settlement (Grade C), with approximately half of the location being within an area identified as having poor connectivity (Grade D). A minor negative impact on transport and connectivity could be expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
+	Local Services	-	A large proportion of this small settlement location is situated within the sustainable target distance to local services. A minor positive impact on accessibility is expected.

C.19.12 SA Objective 12: Education

Table C.19.12: The assessment of the potential development at 'Wellesbourne' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
+	Access to Primary School	-	A minor positive impact can be expected as this location is inside the sustainable target distance of a primary school.
-	Access to Secondary School	M	A minor negative impact can be expected as this location is outside the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Further Education	M	The entirety of this small settlement location is situated outside of the target distance of further education. Consequently, a minor negative impact would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.19.13 SA Objective 13: Economy

Table C.19.13: The assessment of the small settlement location at 'Wellesbourne' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WELLESBOURNE: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within the town of Wellesbourne. A minor positive impact on the local economy could be expected.

C.20 Wilmcote

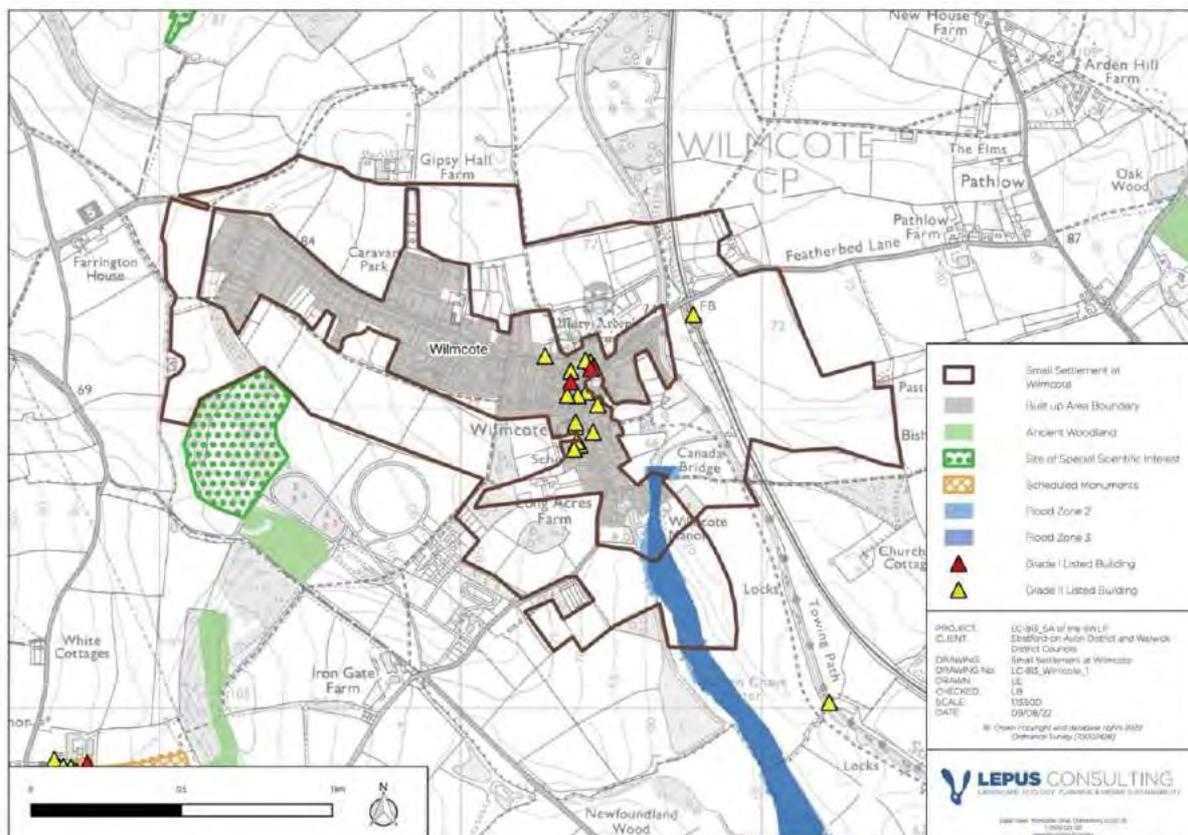


Figure C.20.1: Small settlement at Wilmcote with selected constraints

C.20.1 SA Objective 1: Climate Change

Table C.20.1: The assessment of the small settlement location at ‘Wilmcote’ against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WILMCOTE: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation:</p> <p>The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people’s daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.20.2 SA Objective 2: Flood Risk

Table C.C.20.2: The assessment of the small settlement location at 'Wilmcote' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WILMCOTE: Description of effect
0	Flood Zones	A/M	The majority of land at the small settlement location at Wilmcote lies in Flood Zone 1, the lowest risk of fluvial flooding. A very small strip of land to the south of this location lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.20.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.20.3: The assessment of the small settlement location at 'Wilmcote' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WILMCOTE: Description of effect
+/-	Habitats Sites	-	The plan area is hydrologically connected to several Habitats sites, including those associated with the Severn and Humber Estuaries and Oxford Meadows SAC. There is also the potential for watercourses within the plan area to be functionally linked to the Severn Estuary SAC and Ramsar site and the Humber Estuary SAC and Ramsar site due to the role they play in the life-cycle of qualifying species of fish. The HRA will focus on recreational impacts, hydrological impacts (water quality and quantity) and impacts upon functionally linked land as the SWLP develops. The HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
--	SSSIs	A/M	Located adjacent to 'Copmill Hill' SSSI, designated for its calcareous flora and entomological interest. The IRZ states "all planning applications – except householder applications must consult Natural England". Without mitigation there is potential for major negative impacts on this SSSI. <i>Mitigation: Avoid impacts through the location and layout of any future development and/or mitigate through appropriate management strategies.</i>
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	M	Located approximately 350m from a stand of ancient woodland with connections between these features on PRoW. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure. <i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs in proximity to the location.

Score	SA3: Receptor	Mitigation potential	WILMCOTE: Description of effect
-	LWSs	A/M	Partially coincides with 'Wilmcote Rough', 'Wilmcote Pasture', 'Fields Near Caravan Park', 'Hardwick Farm Meadows', 'Fields to South of Marsh Road Meadow' and 'Marsh Road Meadow' LWSs. Development in this location could have a minor negative impact on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland', 'good quality semi-improved grassland' and 'traditional orchard'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.20.4 SA Objective 4: Landscape

Table C.20.4: The assessment of the small settlement location at 'Wilmcote' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WILMCOTE: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 10.6km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Avon Valley and Arden Character Areas and within the Vale Orchard Belt and Wooded Estate lands local character areas. Vale Orchard Belt is characterised by an open, rolling intensively farmed landscape of large, poorly defined fields, orchards and prominent hilltop woodlands. Wooded Estate lands is characterised as a well wooded estate landscape characterised by a large-scale rolling topography and prominent hilltop woodlands. An area to the south east and north of this location is identified as an enhancement zone and landscape impacts from development are likely to be less significant. The small settlement location could however be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	The 'Arden' SLA lies to the west of this small settlement location with a small area along its western boundary coincident with the SLA. A very small proportion of the overall SLA could therefore potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Avoid developing in Special Landscape Areas. Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.

Score	SA4: Receptor	Mitigation potential	WILMCOTE: Description of effect
-	Views from the PRow Network	M	This proposed location coincides with various PRow. There is the potential for minor negative impacts on the recreational experience and views associated with these, and surrounding, footpaths. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.20.5 SA Objective 5: Cultural Heritage

Table C.20.5: The assessment of the small settlement location at 'Wilmcote' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WILMCOTE: Description of effect
-	Grade I Listed Building	A/M	There is a cluster of Grade I Listed Buildings within Wilmcote, mainly associated with the village centre. These including 'Mary Arden's House and Attached Dairy', 'Palmer's Farmhouse' and 'Dovecote Approximately 4 Metres East of Palmer's Farmhouse'. There is the potential for minor negative impacts on the settings of these heritage assets from development in the area identified around this small settlement. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Grade II* Listed Building	-	Not in close proximity to a Grade II* Listed Building.
-	Grade II Listed Building	A/M	This potential area coincides with two Grade II Listed Buildings - 'Church of St Andrew' and 'Railway Footbridge, Wilmcote Station'. It also lies adjacent to 'The Laurels' and 'Wilmcote Church of England Junior and Infant School' and within 70m of 'The Mason's Arms Public House', 'Barn and Stable Approximately 20 Metres North-East of Palmer's Farmhouse', 'Farm Buildings Approximately 8 Metres North of Palmer's Farmhouse', 'Farm Buildings Approximately 2 Metres North of Mary Arden's House', 'Swan House Hotel', 'K6 Telephone Kiosk, The Green', 'Pear Tree Cottage', 'Apple Tree Cottage', 'The Crofts', 'Kirkside' and 'The Old Vicarage'. A minor negative impact could be expected. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
-	Conservation Area	A/M	'Wilmcote' CA cover the central areas of this small settlement. The small settlement location for development is located around this CA and in some areas is coincident with it. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.20.6 SA Objective 6: Pollution

Table C.C.20.6: The assessment of the small settlement location at 'Wilmcote' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WILMCOTE: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
-	Railway Line	M	A railway line runs to the east of Wilmcote and through the norther eastern section of this small settlement location for development. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The Stratford-upon-Avon Canal runs through the eastern section of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.20.7 SA Objective 7: Natural Resources

Table C.20.7: The assessment of the small settlement location at 'Wilmcote' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WILMCOTE: Description of effect
--	Agricultural Land Classification	M/X	Large proportion of this small settlement location is situated on ALC Grade 3 land and small proportion located upon ALC Grade 4 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversable uses.</i>
-	Mineral Safeguarding Area	M/X	Extensive areas of the northern part of this small settlement location lie within a MSA, where consultation is required. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversable uses.</i>

C.20.8 SA Objective 8: Waste

Table C.20.8: The assessment of the small settlement location at 'Wilmcote' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WILMCOTE: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of this small settlement location. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.20.9 SA Objective 9: Housing

Table C.20.9: The assessment of the small settlement location at 'Wilmcote' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WILMCOTE: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.20.10 SA Objective 10: Health

Table C.20.10: The assessment of the small settlement location at 'Wilmcote' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WILMCOTE: Description of effect
-	NHS Hospital with A&E Department	X	Wholly located outside the target distance to these services. A minor negative impact on access to healthcare would be expected. <i>Mitigation: Improving public transport services will indirectly benefit access to these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the location is wholly outside of the target distance to a GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	Located wholly outside of the target distance to leisure facilities. A minor negative impact on access to these facilities is expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
0	Main Road	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle path network. A minor positive impact on the health and wellbeing is expected.

C.20.11 SA Objective 11: Accessibility

Table C.20.11: The assessment of the small settlement location at 'Wilmcote' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WILMCOTE: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
-	Connectivity	M	Connectivity around Wilmcote varies. Some areas to the North-East and North-West are identified as having good connectivity (Grade B). Other areas, particularly to the south are identified as lacking in connectivity to the village centre (Grade D). Without mitigation, development in less accessible areas may lead to a minor negative impact on transport and access. <i>Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.</i>
-	Local Services	M	This small settlement location is situated outside of the sustainable target distance to local services and therefore a minor negative impact on accessibility is expected. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

C.20.12 SA Objective 12: Education

Table C.20.12: The assessment of the small settlement location at 'Wilmcote' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WILMCOTE: Description of effect
+	Access to Primary School	-	A large proportion of this location is within the target distance to 'Wilmcote C of E Primary School'. A minor positive impact on access to education would be expected.
-	Access to Secondary School	M	This small settlement location is situated wholly outside of the target distance to a secondary school, the closest of which are located in Stratford Upon Avon. A minor negative impact on access to education could be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
+	Access to Further Education	-	The majority of this location is within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

C.20.13 SA Objective 13: Economy

Table C.20.13: The assessment of the small settlement location at 'Wilmcote' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WILMCOTE: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.

Score	SA13: Receptor	Mitigation potential	WILMCOTE: Description of effect
+	Access to Employment Opportunities	-	The location is within the target distance to various employment opportunities, a large proportion of which are within Stratford-upon-Avon. A minor positive impact on the local economy could be expected.

C.21 Wood End

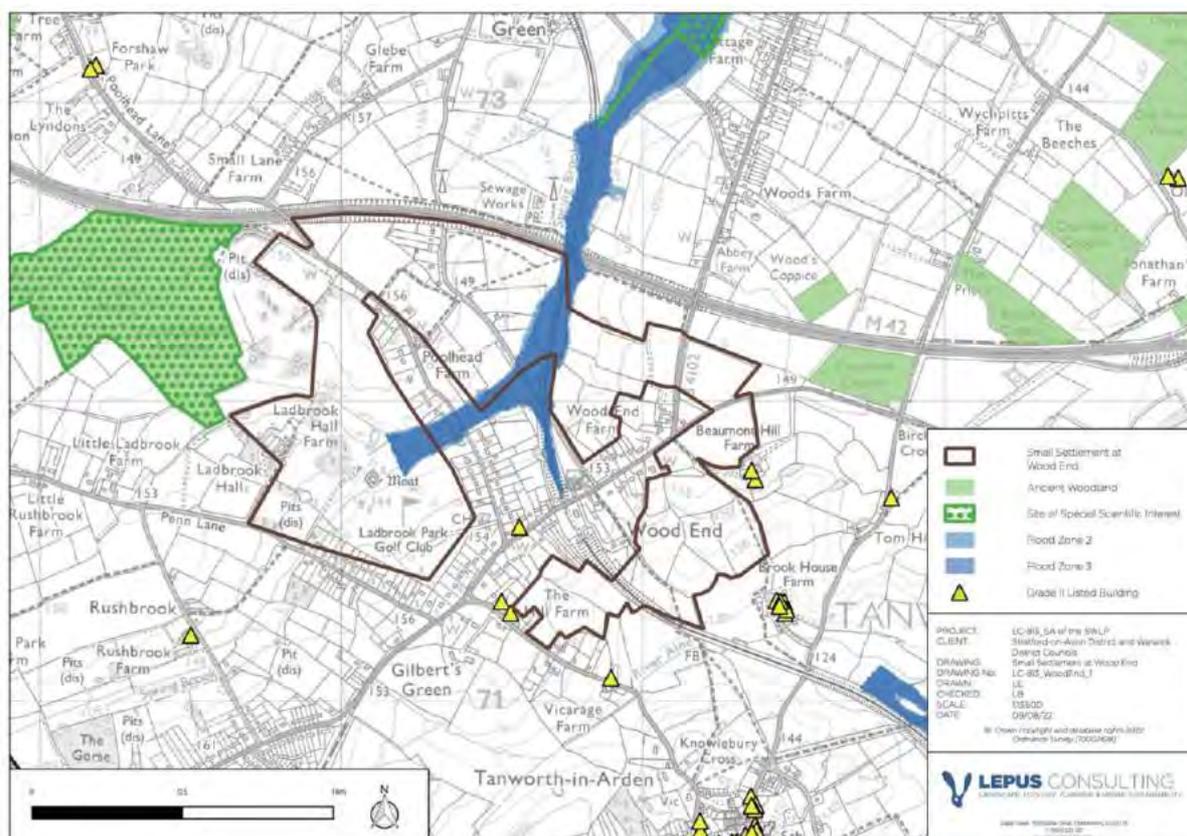


Figure C.21.1: Small settlement at Wood End with selected constraints

C.21.1 SA Objective 1: Climate Change

Table C.21.1: The assessment of the small settlement location at 'Wood End' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WOOD END: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p>Mitigation: The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p>

Score	SA1: Receptor	Mitigation potential	WOOD END: Description of effect
			<i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</i>

C.21.2 SA Objective 2: Flood Risk

Table C.21.2: The assessment of the small settlement location at 'Wood End' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WOOD END: Description of effect
0	Flood Zones	A/M	The majority of land at the small settlement location at Wood End lies in Flood Zone 1, the lowest risk of fluvial flooding. A small proportion of land in the north and through the centre of this location lies in Flood Zones 2 and 3. This however accounts for less than 10% of the overall area of the small settlement location. <i>Mitigation: This impact could be mitigated through avoidance of Flood Zones 2 and 3.</i>
0	Surface Water Flood Risk	A/M	There are scattered areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area. <i>Mitigation: The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</i>

C.21.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.21.3: The assessment of the small settlement location at 'Wood End' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WOOD END: Description of effect
+/-	Habitats Sites	-	The plan area is hydrologically connected to several Habitats sites, including those associated with the Severn and Humber Estuaries and Oxford Meadows SAC. There is also the potential for watercourses within the plan area to be functionally linked to the Severn Estuary SAC and Ramsar site and the Humber Estuary SAC and Ramsar site due to the role they play in the life-cycle of qualifying species of fish. The HRA will focus on recreational impacts, hydrological impacts (water quality and quantity) and impacts upon functionally linked land as the SWLP develops. The HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
--	SSSIs	A/M	Located 20m from 'Windmill Naps Wood' SSSI, designated for its ancient semi-natural woodland and acidophilous ground flora. The IRZ states "all planning applications – except householder applications" must consult Natural England". Without mitigation there is potential for major negative impacts on this SSSI. <i>Mitigation: Avoid impacts through the location and layout of any future development and/or mitigate through appropriate management strategies.</i>
0	NNRs	-	There are no NNRs in proximity to the location.

Score	SA3: Receptor	Mitigation potential	WOOD END: Description of effect
-	Ancient Woodland	M	Located approximately 25m from Ancient Woodland 'Windmill Naps', 170m from Ancient Woodland 'Clarksland Coppice' and Ancient Woodland 'Woods Coppice'. Without mitigation, there is the potential for minor negative impacts on this ancient woodland from increased recreational pressure, light and noise pollution. <i>Mitigation: Mitigate through use of green buffers and other strategies to protect ancient woodland habitats.</i>
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'Shakespeare Line Railway', 'Spring Brook Pond', 'Spring Brook Hedgerow', 'Malthouse Lane Meadows' and 'Poolhead Pastures' LWSs. Development in this location could have minor negative impacts on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'deciduous woodland', 'good quality semi-improved grassland' and 'traditional orchard'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.21.4 SA Objective 4: Landscape

Table C.21.4: The assessment of the small settlement location at 'Wood End' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WOOD END: Description of effect
0	Cotswold AONB (National Landscape)	-	This proposed location is situated approximately 25.5km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Valley Character Area and within the Ancient Arden and Arden Pastures local character areas. Ancient Arden is characterised by a small-scale farmed landscape with a varied, undulating topography, characterised by an irregular pattern of fields and narrow winding lanes. Arden Pastures is characterised by a small scale, enclosed landscape, often pervaded by suburban influences and characterised by small fields, typically bordered by mature hedgerow trees. The small settlement location could be discordant with the features of this local character area and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>

Score	SA4: Receptor	Mitigation potential	WOOD END: Description of effect
-	Special Landscape Areas	M	Wholly coincides with 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRow Network	M	This small settlement location coincides with various PRow footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.21.5 SA Objective 5: Cultural Heritage

Table C.21.5: The assessment of small settlement location at 'Wood End' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WOOD END: Description of effect
0	Grade I Listed Building	-	Not in close proximity to a Grade I Listed Building.
0	Grade II* Listed Building	-	Not in close proximity to a Grade II* Listed Building.
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings both within Wood End and in the area surrounding it. A number of these are visible from the area identified as having potential for development, including, 'Gilbert's Green House', 'Hill Farmhouse', 'Threshing Barn at Beaumont Hill Farm' and 'Beaumont Hill Farmhouse'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
0	Conservation Area	-	'Tanworth-in-Arden' CA lies to the south of this small settlement location but is separated by existing development and fields. Therefore, a negligible impact could be expected on the settings of the buildings and on local cultural heritage.
0	Scheduled Monument	-	Not in close proximity to a Scheduled Monument.

C.21.6 SA Objective 6: Pollution

Table C.21.6: The assessment of the small settlement location at 'Wood End' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WOOD END: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the M42 runs along the norther boundary of this location in a west-east direction. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention /</i>

Score	SA6: Receptor	Mitigation potential	WOOD END: Description of effect
			<i>inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
-	Railway Line	A/M	A railway line runs through Wood End and therefore through this small settlement location. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The Spring Brook (a tributary of the River Blythe) flows in a northerly direction through the northern section of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.21.7 SA Objective 7: Natural Resources

Table C.21.7: The assessment of the small settlement location at 'Wood End' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WOOD END: Description of effect
--	Agricultural Land Classification	M/X	Approximately half of this small settlement location is situated on ALC Grade 3 land and the other half located upon ALC Grade 4 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	Approximately half of this small settlement location lies within a MSA, where consultation is required for development. A minor negative impact on natural resources could be expected. <i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.21.8 SA Objective 8: Waste

Table C.21.8: The assessment of the small settlement location at 'Wood End' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WOOD END: Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of the Small Settlement.

Score	SA8: Receptor	Mitigation potential	WOOD END: Description of effect
			<i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.21.9 SA Objective 9: Housing

Table C.21.9: The assessment of the small settlement location at 'Wood End' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WOOD END: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.21.10 SA Objective 10: Health

Table C.21.10: The assessment of the small settlement location at 'Wood End' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WOOD END: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Alexandra Hospital', approximately 7.7km southwest from the small settlement location. This lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
++	Access to GP Surgery	-	Majority of small settlement location is located within 800m of a GP surgery.
-	Access to Leisure Facilities	M	The small settlement location is situated approximately 8.5km away from 'Studley Leisure Centre'. Therefore, it is located outside of the target distance. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on air quality and noise pollution could be expected as the M42 is located adjacent to the north boundary of this small settlement location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle network. A minor positive impact on health and wellbeing is expected.

C.21.11 SA Objective 11: Accessibility

Table C.21.11: The assessment of the small settlement location at 'Wood End' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WOOD END: Description of effect
+	Bus Stop	-	Areas of this small settlement location are within the target distance to a bus stop providing regular services and therefore a minor positive impact on accessibility is expected.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
0	Connectivity	-	Approximately half of the area of search, to the north and South-East, is located within an area mostly identified as having moderate connectivity to the existing settlement (Grade C), with the other half of the area of search within an area, to the North-East and South-West, identified as having very good connectivity (Grade A). A negligible impact on transport and connectivity could be expected overall.
+	Local Services	-	A proportion of this small settlement location is situated within the sustainable target distance to local services and therefore a minor negative impact on accessibility is expected.

C.21.12 SA Objective 12: Education

Table C.21.12: The assessment of the small settlement location at 'Wood End' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WOOD END: Description of effect
+	Access to Primary School	-	A minor positive impact can be expected as most of this location is inside the sustainable target distance of a primary school.
+	Access to Secondary School	-	A minor positive impact can be expected as this location is inside the sustainable target distance of a secondary school.
-	Access to Further Education	M	The entirety of this small settlement location is situated outside the target distance for further education. Consequently, a minor negative impact would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.21.13 SA Objective 13: Economy

Table C.21.13: The assessment of the small settlement location at 'Wood End' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WOOD END: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to one employment opportunity. A minor positive impact on the local economy could be expected. However due to the limited number of employment opportunities this positive impact will be very small.

C.22 Wootton Wawen

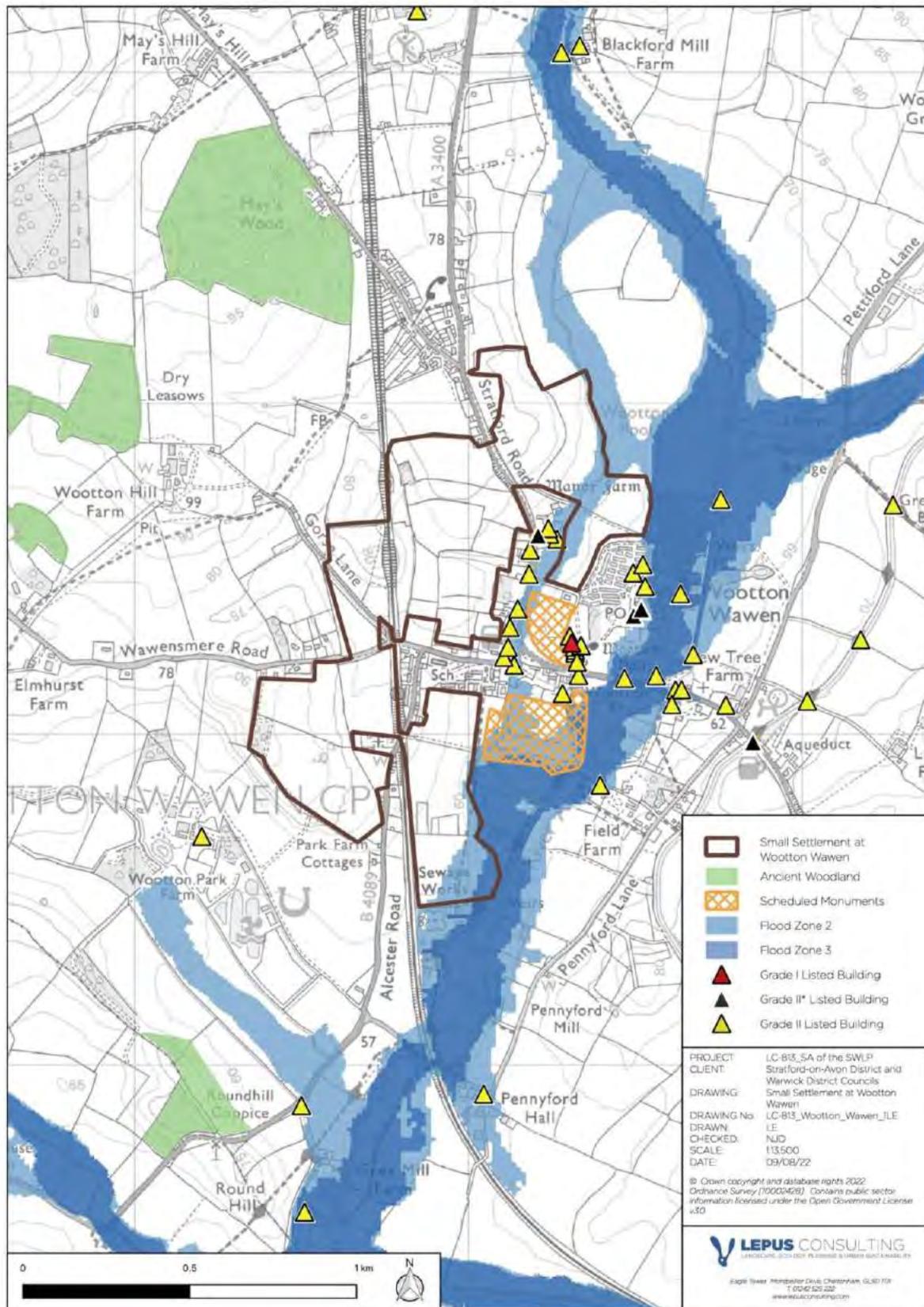


Figure C.22.1: Small settlement at Wootton Wawen with selected constraints

C.22.1 SA Objective 1: Climate Change

Table C.22.1: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
-	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. For the purposes of this assessment, it has been assumed that development in this small settlement location could deliver a maximum of 500 dwellings and could therefore increase carbon emissions in the plan area by more than 0.1% and result in a minor negative impact.</p> <p><i>Mitigation:</i> The SWLP seeks to support the creation of 20-minute neighbourhoods where development is located close to local services to meet people's daily needs, reducing the need to travel by private car and encouraging use of active transport and public transport. This would have a positive impact on GHG emissions.</p> <p>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</p> <p>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change</p>

C.22.2 SA Objective 2: Flood Risk

Table C.22.2: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
0	Flood Zones	A/M	<p>The majority of land at the small settlement location at Wootton Wawen lies in Flood Zone 1, the lowest risk of fluvial flooding. A proportion of land to the east of the settlement lies in Flood Zones 2 and 3, which associated with the floodplain of the River Alne. This however accounts for less than 10% of the overall area of the small settlement location.</p> <p><i>Mitigation:</i> This impact could be mitigated through avoidance of Flood Zones 2 and 3.</p>
0	Surface Water Flood Risk	A/M	<p>There are areas of low, medium and high SWFR across the small settlement location. However, the overall area covered by land at high risk of surface water flooding accounts for less than 10% of the overall site area.</p> <p><i>Mitigation:</i> The layout of the site could be designed to avoid areas at risk of high surface water flooding. Future SWLP policies and existing PPG require the incorporation of sustainable drainage schemes which will seek to reduce surface water flood risk by maintaining surface water drainage.</p>

C.22.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table C.22.3: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
+/-	Habitats Sites	-	<p>The plan area is hydrologically connected to several Habitats sites, including those associated with the Severn and Humber Estuaries and Oxford Meadows SAC. There is also the potential for watercourses within the plan area to be functionally linked to the Severn Estuary SAC and Ramsar site and the Humber Estuary SAC and Ramsar site due to the role they play in the life-cycle of qualifying species of</p>

Score	SA3: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
			fish. The HRA will focus on recreational impacts, hydrological impacts (water quality and quantity) and impacts upon functionally linked land as the SWLP develops. The HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. <i>Mitigation: Avoid impacts on site integrity through HRA recommendations and implementation of SWLP planning policies.</i>
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	There are no Ancient Woodlands in proximity to the location which would be likely to be impacted by development at this small settlement.
0	LNRs	-	There are no LNRs in proximity to the location.
-	LWSs	A/M	Partially coincides with 'River Alne' LWS. Development in this location could have minor negative impacts on LWS, without mitigation. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>
0	LGSs	-	There are no LGSs in proximity to the location.
-	Priority Habitats	A/M	A number of priority habitats are located in the area of search including, 'coastal and floodplain grazing marsh'. There is potential for minor negative impacts on priority habitats. <i>Mitigation: Avoid impacts through the location and layout of future proposals and seek to retain areas of priority habitat.</i>

C.22.4 SA Objective 4: Landscape

Table C.22.4: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
0	Cotswold AONB (National Landscape)	-	Located approximately 16.4km from the Cotswolds AONB. Development in this location would be unlikely to significantly impact the AONB.
-	Landscape Character	M	This small settlement location is situated in the Arden Valley Character Area and within the Wooded Estatelands and Arden River Valleys local character areas. Wooded Estatelands is characterised by a well wooded estate landscape characterised by a large scale rolling topography and prominent hilltop woodlands. Arden River Valleys is characterised by narrow meandering river corridors with riverside trees and grazing meadows. The small settlement location could be discordant with the features of these local character areas and a minor negative impact on landscape could arise. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A/M	Includes areas of 'high' and 'high-medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in</i>

Score	SA4: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
			<i>terms of location in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	This small settlement location wholly coincides with the 'Arden' SLA, therefore a small proportion of the overall SLA could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Park	-	Not in proximity to a Country Park.
-	Views from the PRoW Network	M	This small settlement location coincides with a PRoW and is adjacent to other PRoW. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	Development in this area of search is unlikely to lead to the coalescence of settlements.

C.22.5 SA Objective 5: Cultural Heritage

Table C.22.5: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
-	Grade I Listed Building	A/M	There is one Grade I Listed Building located within Wootton Wawen - 'Church of St Peter'. There is the potential for minor negative impacts on the setting of this heritage asset. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
-	Grade II* Listed Building	A/M	There is one Grade II* Listed Building which is likely to be visible from the small settlement location for development around Wootton Wawen - 'Manor Farmhouse'. There is the potential for minor negative impacts on the setting of this heritage asset. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
-	Grade II Listed Building	A/M	There are a number of Grade II Listed Buildings within Wootton Wawen itself and in the surrounding area, a number of which may be visible from this small settlement location for development. These include, 'Stables at Manor Farm', 'Travellers Rest' and 'Clements Cottage'. There is the potential for minor negative impacts on the settings of these heritage assets. <i>Mitigation: It is likely that impacts on the setting of these assets could be avoided through the layout and design of the proposals.</i>
0	Registered Parks and Gardens	-	Not in close proximity to a RPG.
-	Conservation Area	A/M	The 'Wootton Wawen' CA covers the centre of Wootton Wawen, with the small settlement location for development extending around this area to the north and west. Without mitigation, a minor negative impact on the setting of this CA could be expected. <i>Mitigation: Impacts could be mitigated by avoiding development within the conservation area and ensuring any future development conserves and enhances the character and appearance of the conservation area.</i>
-	Scheduled Monument	A	'Ponds SW of Wootton Bridge' SM is located approximately 31m to the east, and 'Earthworks W of St Peter's Church' SM approximately 43m to the south and east of this small settlement location for development. Due to the close

Score	SA5: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
			proximity to these heritage assets there could be a minor negative impact on their settings. <i>Mitigation: Avoid impacts through the location and layout of future proposals.</i>

C.22.6 SA Objective 6: Pollution

Table C.22.6: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
0	AQMA	-	Not in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on future residents due to air quality and noise pollution could be expected as the A3400 runs in a north – south direction through this location. <i>Mitigation: Avoid impacts through the location, design and layout of future proposals or mitigate through retention / inclusion of green buffers and vegetation to maintain and enhance air quality. Promote active travel choices, sustainable modes of transport and provide electric charging infrastructure for vehicles.</i>
-	Railway Line	A/M	A railway line runs through Wootton Wawen in a north – south direction and also through this small settlement location for development. A minor negative impact on future residents due to air and noise pollution and vibration could therefore be expected. <i>Mitigation: Avoid impacts through the sensitive location and layout of future proposals or mitigate through the retention or provision of green buffers, planting and noise bunds / screens.</i>
-	Watercourse	M	The River Alne (a tributary of the River Arrow) flows in a southerly direction along the eastern boundary of this small settlement location. There is potential for minor negative impacts on this watercourse from surface water run-off associated with new development. <i>Mitigation: Implementation of environmentally sensitive construction practices. Sensitive design of site surface water drainage system to prevent pollution of watercourses. This should reflect the requirements of the WFD and, where applicable, the requirement for Good Ecological Status</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

C.22.7 SA Objective 7: Natural Resources

Table C.22.7: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
--	Agricultural Land Classification	M/X	Large proportion of this small settlement location is situated on ALC Grade 2 & 3 land and small proportion located upon ALC Grade 4 land. Should the Grade 3 land be assessed in the future as Grade 3a, which is assumed when Grade 3 data is not sub-divided into 3a or 3b, there is the potential for development at this location to have a major negative impact on natural resources due to the irreversible loss of BMV soils. <i>Mitigation: Cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of BMV land for greenspace or other non-permeant/reversible uses.</i>
-	Mineral Safeguarding Area	M/X	Approximately half of this small settlement location lies within a MSA, where consultation is required. A minor negative impact on natural resources could be expected.

Score	SA7: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
			<i>Mitigation: Consultation will be needed to confirm the extent to which mineral extraction may be sterilised by development. Impacts cannot be wholly mitigated. Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

C.22.8 SA Objective 8: Waste

Table C.22.8: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	WOOTTON WAWEN Description of effect
-	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The housing number for this location is currently unknown, however there is potential for the development of over 75 dwellings, so could potentially increase household waste generation by more than 0.1% in comparison to current levels within Stratford-on-Avon. A minor negative impact on waste could be expected upon development of the Small Settlement. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

C.22.9 SA Objective 9: Housing

Table C.22.9: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
++	Housing provision	-	For the purposes of this assessment, it has been assumed that development in this small settlement location would deliver a maximum of 500 dwellings. This would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

C.22.10 SA Objective 10: Health

Table C.22.10: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is 'Alexandra Hospital', approximately 10km west of this small settlement location. It therefore lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the small settlement location is situated outside of the target distance to GP Surgery. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>
-	Access to Leisure Facilities	M	This small settlement location is located outside the target distance of any leisure facility. <i>Mitigation: Provision of improved active and public transport links to key services and facilities.</i>

Score	SA10: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
0	AQMA	-	Located more than 200m from an AQMA. A neutral impact on health is expected.
-	Main Road	M	A minor negative impact on air quality and noise pollution could be expected as the A3400 runs through the centre of this small settlement location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	Major positive effect expected. Small settlement location is entirely or substantially situated within the target distance to one or more greenspaces.
+	Access to PRow / Cycle Path Networks	-	Located within target distance to a PRow and cycle network. A minor positive impact on health and wellbeing is expected.

C.22.11 SA Objective 11: Accessibility

Table C.22.11: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
++	Bus Stop	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a bus stop providing regular services.
++	Railway Station	-	A major positive impact could be expected as the majority of the small settlement location is situated within the target distance to a train station providing regular services.
++	Connectivity	-	A large proportion of this small settlement location is situated within an area identified as having excellent connectivity to the existing settlement (Grade A). There are also smaller proportions of this small settlement location which lie within areas identified as having moderate (Grade C) and poor (Grade D) connectivity, but the areas are so small the minor negative impact is likely to be negligible. A major positive impact on connectivity could be expected.
+	Local Services	-	A large proportion of this small settlement location is situated within the sustainable target distance to local services and therefore a minor positive impact on accessibility is expected.

C.22.12 SA Objective 12: Education

Table C.22.12: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
+	Access to Primary School	-	A minor positive impact can be expected as most of this location is within the sustainable target distance of a primary school.
-	Access to Secondary School	M	A minor negative impact can be expected as only a small proportion of this small settlement location is situated within the sustainable target distance of a secondary school. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>
-	Access to Further Education	M	The entirety of this small settlement location is situated outside of the target distance of further education. Consequently, a minor negative impact would be expected. <i>Mitigation: Potential for the provision of improved active and public transport links to education facilities.</i>

C.22.13 SA Objective 13: Economy

Table C.22.13: The assessment of the small settlement location at 'Wootton Wawen' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	WOOTTON WAWEN: Description of effect
+/-	Employment Floorspace Provision	-	The location currently comprises undeveloped land and is not likely to result in a loss of current employment space. The location could provide employment opportunities such as the development of a local centre which could include small scale shops and services, resulting in employment opportunities for future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this location are uncertain.
+	Access to Employment Opportunities	-	The location is within the target distance to one employment opportunity, A minor positive impact on the local economy could be expected. However due to the limited number of employment opportunities this positive impact will be very small.

Appendix D: Assessment of New Settlements

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D.1 Introduction

D.1.1 Overview

- D.1.1.1 This appendix provides an appraisal of 7 New Settlements where, at present, an assumption of 40 dwellings per hectare has been applied and that 40% of the New Settlement would comprise greenspace that optimises green infrastructure benefits including delivery of ecosystem services and protects and enhances natural capital.
- D.1.1.2 The New Settlements have been assessed for likely impacts on each of the 13 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in the tables within each SA Objective chapter, in accordance with the methodology set out in **Chapter 2** of the main SA Report.
- D.1.1.3 At this stage, all assessment is based on desktop review of available data and information about receptors and sources.
- D.1.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by Stratford-on-Avon and Warwick District Councils, as well as expert judgement.
- D.1.1.5 A number of recommendations have been made for further surveys to improve granularity of assessment. These can be found in **Chapter 10** of the main report.

D.2 A1

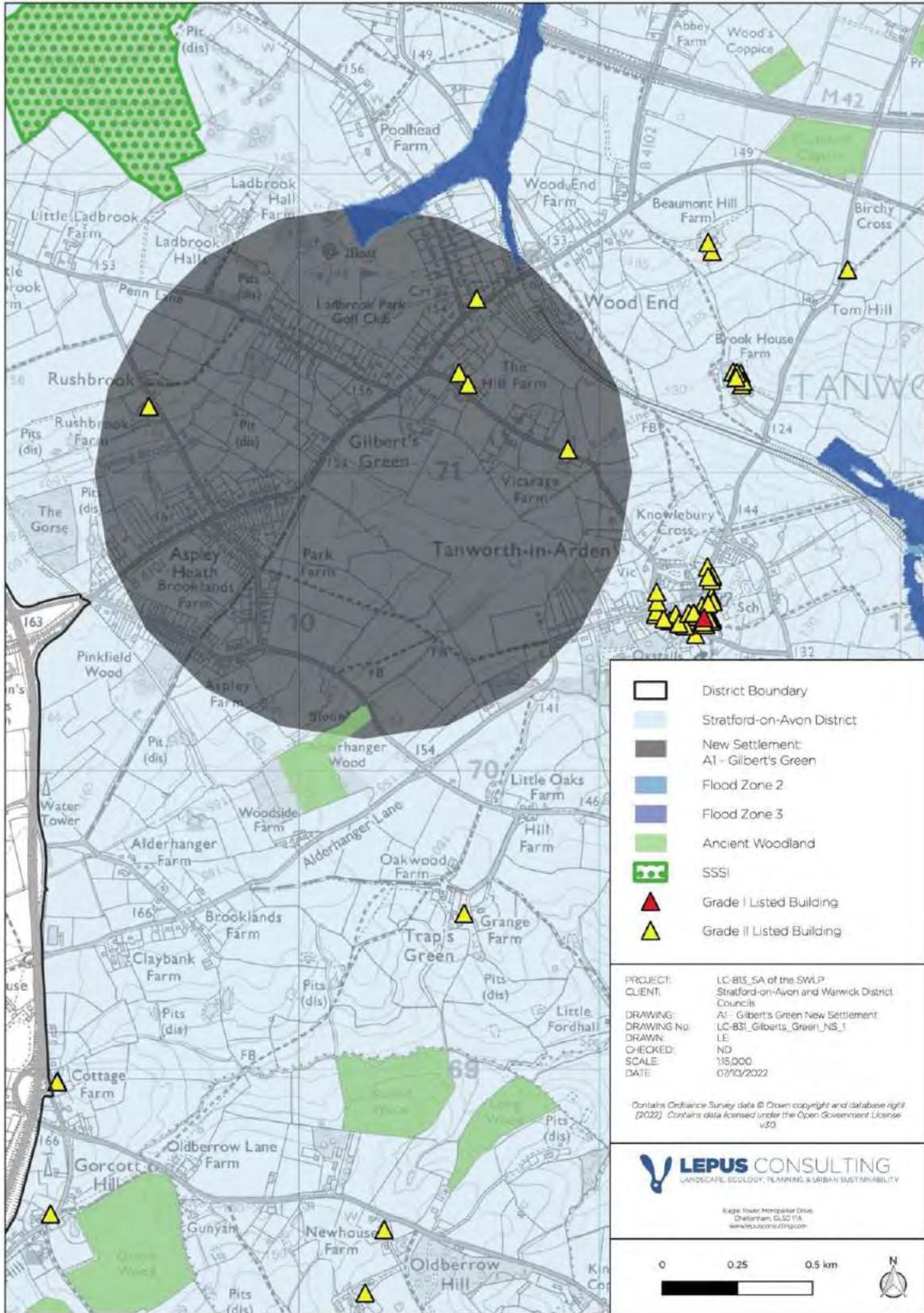


Figure D.2.1: New Settlement at 'A1' with selected constraints.

D.2.1 SA Objective 1: Climate Change

Table D.2.1: The assessment of New Settlement at 'A1' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	A1: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this New Settlement could deliver approximately 6,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The New Settlements have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

D.2.2 SA Objective 2: Flood Risk

Table D.2.2: The assessment of New Settlement at 'A1' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	A1: Description of effect
+	Riparian Flood Zones	-	Less than 1% of the New Settlement coincides with Flood Zones 2 and/or 3. A minor positive impact on flooding in riparian flood zones would be expected.
0	Surface Water Flood Risk	-	Less than 10% of the New Settlement coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected.

D.2.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table D.2.3: The assessment of New Settlement at 'A1' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	A1: Description of effect
0	Habitats Sites	-	Development at the New Settlement is not expected to result in adverse impacts on any Habitat Sites. A negligible impact on Habitat Sites is consequently expected.
-	SSSIs	M	<p>The New Settlement is located within an Impact Risk Zone which requires consultation with Natural England for 'Residential development 100 units or more/Any residential development of 50 or more houses outside existing settlements/urban areas'.</p> <p><i>Mitigation: Consult with Natural England</i></p>
0	NNRs	-	There are no NNRs in proximity to the location.
-	Ancient Woodland	A/M	<p>A small proportion of the New Settlement coincides with an 'unnamed ancient and semi-natural woodland'. A minor negative impact on this ancient woodland would be expected.</p> <p><i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through suitable buffer from the ancient woodland.</i></p>
0	LNRs	-	There are no LNRs located in proximity of the New Settlement.
--	LWSs	A	<p>A minor negative impact would be expected as the New Settlement coincides with multiple LWS's including: 'Park Farm Meadows'; 'Poolhead Pastures'; and 'Park Farm Hedgerow'.</p> <p>A major negative impact would be expected on these LWSs.</p>

Score	SA3: Receptor	Mitigation potential	A1: Description of effect
			<i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i>
0	LGS	-	The New Settlement does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact would be expected as the New Settlement coincides with deciduous woodland, lowland meadows and traditional orchard. <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

D.2.4 SA Objective 4: Landscape

Table D.2.4: The assessment of New Settlement at 'A1' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	A1: Description of effect
0	National Landscapes/AONBs	-	Located approximately 25km from the Cotswolds AONB. Development in this New Settlement would be unlikely to significantly impact the AONB.
-	Landscape Character	M	Located within Arden – Wooded Estate lands Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. The New Settlement could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	A/M	Includes less than 50% area of 'high' and 'high/medium' landscape sensitivity. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of New Settlement in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	The New Settlement is located within 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape would be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with PRow footpaths in the south and west. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths would be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	This New Settlement is likely to increase the risk of coalescence between Aspley Heath, Woodend and Tanworth-in-Arden. A major negative impact would be expected on the risk of coalescence as a result of development at this New Settlement. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

D.2.5 SA Objective 5: Cultural Heritage

Table D.2.5: The assessment of New Settlement at 'A1' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	A1: Description of effect
0	Grade I Listed Building	-	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
0	Grade II* Listed Building	-	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
--	Grade II Listed Building	A	The New Settlement coincides with 5 Grade II Listed Buildings: 'Old Timbers'; 'House'; 'Hill Farmhouse, Rushbrook Farmhouse'; and 'Hill Farm Cottage'. A major negative impact on the character and setting of these Grade II Listed Buildings, with the likelihood of direct, permanent, irreversible impacts. <i>Mitigation: Avoid impacts through layout and design of future development proposals.</i>
-	Conservation Area	A/M	The New Settlement coincides with 'Tanworth-in-Arden' CA. A minor negative impact is expected on the setting of this CA. <i>Mitigation: Avoid or mitigate impacts through layout and design of future development proposals.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monuments.
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Local Archeological Record Site	-	Not located in proximity to any Local Archaeological Record Sites.

D.2.6 SA Objective 6: Pollution

Table D.2.6: The assessment of New Settlement at 'A1' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	A1: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	The New Settlement is located within 200m of the A435. A minor negative impact on air quality and noise pollution would be expected. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	A railway line coincides with the New Settlement, with development likely to expose some end users to higher levels of transport-associated air and noise pollution, resulting in a minor negative impact. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.

Score	SA6: Receptor	Mitigation potential	A1: Description of effect
-	Watercourses	M	The New Settlement coincides with the River Alne. The construction and occupation of large-scale residential development has the potential for a minor negative impact on watercourse quality. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>

D.2.7 SA Objective 7: Natural Resources

Table D.2.7: The assessment of New Settlement at 'A1' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	A1: Description of effect
--	ALC Grade	M/X	The New Settlement has approximately 160ha located on ALC Grade 3 land. If the land in the New Settlement is found to be Grade 3a there would be a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources would be expected as the majority of the New Settlement coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

D.2.8 SA Objective 8: Waste

Table D.2.8: The assessment of New Settlement at 'A1' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	A1: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 6,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon, and a major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

D.2.9 SA Objective 9: Housing

Table D.2.9: The assessment of New Settlement at 'A1' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	A1: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 6,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

D.2.10 SA Objective 10: Health

Table D.2.10: The assessment of New Settlement at 'A1' against SA Objective 10 (Health)SA Objective 11: Accessibility

Score	SA10: Receptor	Mitigation potential	A1: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is the Alexandra Hospital located in Redditch, approximately 6.8km to the southwest. This New Settlement lies outside of the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	A minor positive impact would be expected as a proportion of the New Settlement is located within the target distance to a GP Surgery.
-	Access to Leisure Facilities	M	A minor negative impact on health would be expected as the New Settlement is outside of the sustainable target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access leisure facilities.</i>
0	AQMA	-	The New Settlement is not within or in close proximity to an AQMA.
-	Main Road	M	The New Settlement is located within 200m of the A435. A minor negative impact on health would be expected. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive impact on health would be expected as majority of the New Settlement is located within the target distance to one or more greenspaces and has the potential for greenspace provision.
+	PRoW / Cycle Path	-	Located within target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

D.2.11 SA Objective 11: Accessibility

Table D.2.11: The assessment of New Settlement at 'A1' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	A1: Description of effect
-	Bus Stop	M	A minor negative impact could be expected as the New Settlement is located outside of the target distance to a bus stop providing regular services. <i>Mitigation: Public transport improvement schemes and active travel measures.</i>
++	Railway Station	-	The New Settlement is located approximately 80m from 'Wood End Station' and is entirely within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.
+	Connectivity	-	A large proportion of the New Settlement lies within an area identified as having good connectivity to the wider Plan area (Grade B). A minor positive impact on connectivity would be expected.
-	Food stores	M	The New Settlement is located outside of the sustainable target distance to a food store. A minor negative impact on access to food stores would be expected. <i>Mitigation: Public transport improvement schemes and active travel measures, or provision within the layout of the development.</i>

D.2.12 SA Objective 12: Education

Table D.2.12: The assessment of New Settlement at 'A1' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	A1: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the New Settlement is within the sustainable target distance to the nearest primary school 'Tanworth-in-Arden C of E Primary School'.
-	Access to Secondary School	M	A minor negative impact would be expected as the New Settlement is approximately 5.2km from the nearest secondary school. <i>Mitigation: Improvements to sustainable public transport and active travel measures may improve access to secondary educational facilities at the New Settlement.</i>
-	Access to Further Education	M	A minor negative impact would be expected as the New Settlement is outside of the sustainable target distance to further education facilities. <i>Mitigation: Improvements to sustainable public transport and active travel measures may improve access to further educational facilities at the New Settlement.</i>

D.2.13 SA Objective 13: Economy

Table D.2.13: The assessment of New Settlement at 'A1' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	A1: Description of effect
+/-	Employment Floorspace Provision	-	The New Settlement currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlement could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on access to employment opportunities would be expected as the New Settlement is within the target distance to various employment opportunities situated in Redditch. Despite being outside of the SWLP area in the Worcestershire County, it is expected that site end users would have sufficient access to employment opportunities in Redditch.

D.3.1 SA Objective 1: Climate Change

Table D.3.1: The assessment of New Settlement at 'B1' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	B1: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this New Settlement could deliver approximately 6,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The New Settlements have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

D.3.2 SA Objective 2: Flood Risk

Table D.3.2: The assessment of New Settlement at 'B1' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	B1: Description of effect
+	Riparian Flood Zones	-	Less than 1% of the New Settlement coincides with Flood Zones 2 and/or 3. A minor positive impact on flooding in riparian flood zones would be expected.
0	Surface Water Flood Risk	-	Less than 10% of the New Settlement coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected.

D.3.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table D.3.3: The assessment of New Settlement 'B1' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	B1: Description of effect
0	Habitats Sites	-	Development at the New Settlement is not expected to result in adverse impacts on any Habitat Sites. A negligible impact on Habitat Sites is consequently expected.
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the New Settlement.
-	Ancient Woodland	M	<p>An unnamed ancient woodland is located approximately 100m from the New Settlement. A minor negative impact on this ancient woodland would be expected following development at this New Settlement.</p> <p><i>Mitigation: Mitigate through use of green buffers and appropriate layout and design to protect ancient woodland habitats.</i></p>
0	LNRs	-	There are no LNRs located in proximity of the New Settlement.
-	LWSs	A	<p>A minor negative impact could be expected as the New Settlement coincides with multiple LWS's including 'Wood at Hatton Farm', 'Grand Union Canal' and 'Railway Embankment'.</p> <p><i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i></p>
0	LGS	-	The New Settlement does not coincide with any LGSs.

Score	SA3: Receptor	Mitigation potential	B1: Description of effect
-	Priority Habitats	A/M	A minor negative impact would be expected as the New Settlement coincides with deciduous woodland and traditional orchard habitat types. <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

D.3.4 SA Objective 4: Landscape

Table D.3.4: The assessment of New Settlement at 'B1' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	B1: Description of effect
0	National Landscapes/AONBs	-	Located approximately 22km from the Cotswolds AONB. Development in this New Settlement would be unlikely to significantly impact the AONB.
-	Landscape Character	M	Located within Arden – Wooded Estate lands Character Area. Arden is seen to be a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. The New Settlement could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
0	Landscape Sensitivity	-	The development proposal is located within areas of 'low' sensitivity as identified in the Landscape Sensitivity Analysis. A negligible impact on sensitive landscapes is expected.
-	Special Landscape Areas	M	The New Settlement is located approximately 250m from 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape would be expected. <i>Mitigation: Mitigate through use of landscape-led design.</i>
0	Country Parks	-	There are no Country Parks in proximity to the New Settlement.
-	Views for PRow Users	M	Coincides with PRow footpaths in the south of the New Settlement. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths would be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	This New Settlement is likely to lead to coalescence between Hatton Station and Hatton Green. A minor negative impact on risk of coalescence is expected following development at this New Settlement. <i>Mitigation: Mitigate through use of layout and design of the settlement.</i>

D.3.5 SA Objective 5: Cultural Heritage

Table D.3.5: The assessment of New Settlement at 'B1' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	B1: Description of effect
0	Grade I Listed Building	-	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
-	Grade II* Listed Building	A	Located approximately 170m from the 'Church of Holy Trinity' Grade II* Listed Building and separated by undeveloped land, farmland and greenfield. A minor negative impact on the setting of this Grade II* Listed Building is expected.

Score	SA5: Receptor	Mitigation potential	B1: Description of effect
			<i>Mitigation: This feature lies outside the New Settlement. It is likely that impacts on the significance of this asset could be avoided through the layout and design of the proposals.</i>
--	Grade II Listed Building	A	The New Settlement coincides with 4 Grade II Listed Buildings: 'Hatton House'; 'Gardeners Cottage'; 'Hatton Lane Farmhouse'; and 'Water View'. A major negative impact on the character and setting of these Grade II Listed Buildings is expected, with the likelihood of direct, permanent, irreversible impacts. <i>Mitigation: Avoid impacts through layout and design of future development proposals.</i>
0	Conservation Area	-	The New Settlement is not located within proximity to any conservation areas.
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monuments.
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Local Archeological Record Site	-	Not located in proximity to any Local Archeological Record Sites.

D.3.6 SA Objective 6: Pollution

Table D.3.6: The assessment of New Settlement at 'B1' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	B1: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact could be expected as the New Settlement is adjacent to the M40 and 150m from the A4177. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	A railway line coincides with the New Settlement, with development at likely to expose some end users to higher levels of transport-associated air and noise pollution, resulting in a minor negative impact. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.
-	Watercourses	M	The New Settlement coincides with the 'Grand Union canal; Warwick to Solihull'. A minor negative impact on watercourse quality could be expected upon development at this New Settlement. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>

D.3.7 SA Objective 7: Natural Resources

Table D.3.7: The assessment of New Settlement at 'B1' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	B1: Description of effect
--	ALC Grade	M/X	The New Settlement is located entirely upon ALC Grade 3 land. The potential development at this New Settlement could have a major negative impact on natural resources due to the irreversible loss of this important natural resources. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	The New Settlement coincides with an MSA. A minor negative impact on natural resources would be expected upon development of this New Settlement due to the potential for sterilisation of minerals. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

D.3.8 SA Objective 8: Waste

Table D.3.8: The assessment of New Settlement at 'B1' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	B1: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 6,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Warwick. A major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

D.3.9 SA Objective 9: Housing

Table D.3.9: The assessment of New Settlement at 'B1' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	B1: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 6,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

D.3.10 SA Objective 10: Health

Table D.3.10: The assessment of New Settlement at 'B1' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	B1: Description of effect
+	NHS Hospital with A&E Department	-	The New Settlement is partially located within the sustainable target distance from 'Warwick Hospital'. Development at this New Settlement could provide good access to healthcare and result in a minor positive impact.
-	Access to GP Surgery	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access GP surgeries.</i>

Score	SA10: Receptor	Mitigation potential	B1: Description of effect
-	Access to Leisure Facilities	M	A minor negative impact on health would be expected as the New Settlement is outside of the sustainable target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access leisure facilities.</i>
0	AQMA	-	The New Settlement is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on health could be expected as the New Settlement is adjacent to the M40 and 150m from the A4177. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
+	Access to Greenspace	-	A minor positive impact on health would be expected as the New Settlement is located within the target distance to one or more greenspaces and has the potential for greenspace provision.
+	PRoW / Cycle Path	-	Located within target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

D.3.11 SA Objective 11: Accessibility

Table D.3.11: The assessment of New Settlement at 'B1' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	B1: Description of effect
-	Bus Stop	M	A minor negative impact could be expected as the New Settlement is located outside of the target distance to a bus stop providing regular services. <i>Mitigation: Public transport improvement schemes and active travel measures.</i>
++	Railway Station	-	The New Settlement coincides with 'Hatton Station', with the entire site within the sustainable target distance. A major positive impact on site end users' access to rail services is expected.
0	Connectivity	-	Unlikely to have an impact on transport as a large proportion of the New Settlement lies within an area identified as having moderate connectivity to the wider Plan area (Grade C).
-	Food stores	M	The New Settlement is outside of the sustainable target distance to a food store, located approximately 1.8km from the nearest store. A minor negative impact on access to food stores would be expected.

D.3.12 SA Objective 12: Education

Table D.3.12: The assessment of New Settlement at 'B1' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	B1: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected on access to primary education as the New Settlement is partially within the sustainable target distance from 'The Fencumbe C of E Primary School'.
-	Access to Secondary School	M	A minor negative impact would be expected as the New Settlement is approximately 3.8km from the nearest secondary school. <i>Mitigation: Improvements to sustainable public transport and active travel measures may improve access to secondary educational facilities at the New Settlement.</i>

Score	SA12: Receptor	Mitigation potential	B1: Description of effect
+	Access to Further Education	-	The New Settlement is located within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

D.3.13 SA Objective 13: Economy

Table D.3.13: The assessment of New Settlement at 'B1' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	B1: Description of effect
+/-	Employment Floorspace Provision	-	The New Settlement currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlement could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the New Settlement is within the target distance to various employment opportunities.

D.4 C1

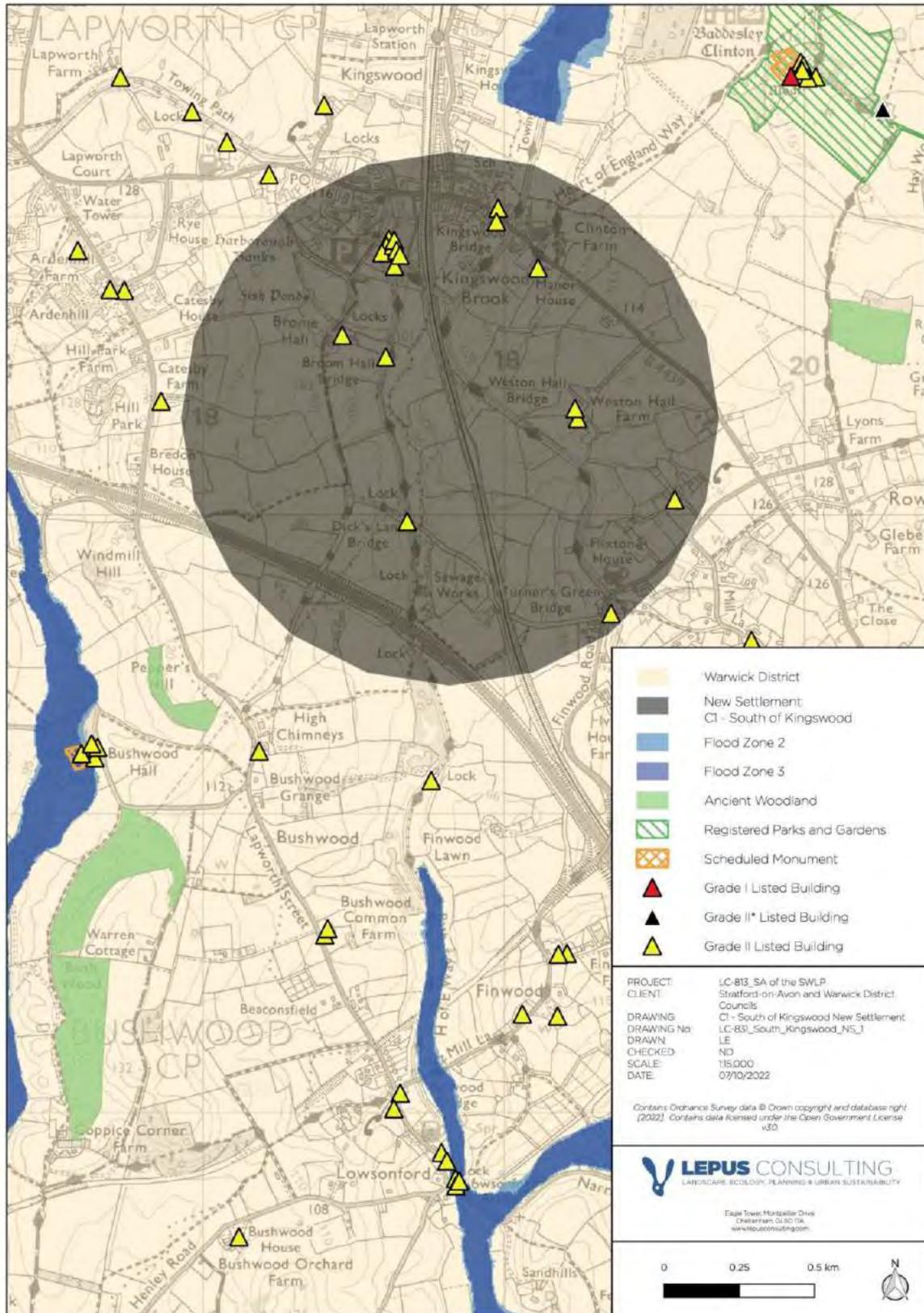


Figure D.4.1: New Settlement at 'C1' with selected constraints.

D.4.1 SA Objective 1: Climate Change

Table D.4.1: The assessment of New Settlement at 'C1' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	C1: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this New Settlement could deliver approximately 6,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The New Settlements have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

D.4.2 SA Objective 2: Flood Risk

Table D.4.2: The assessment of New Settlement at 'C1' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	C1: Description of effect
+	Riparian Flood Zones	-	The New Settlement is located entirely outside of Flood Zones 2/3. A minor positive impact on flooding in riparian flood zones would be expected at the New Settlement.
0	Surface Water Flood Risk	-	Less than 10% of the New Settlement coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the New Settlement.

D.4.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table D.4.3: The assessment of New Settlement at 'C1' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	C1: Description of effect
0	Habitats Sites	-	Development at the New Settlement is not expected to result in adverse impacts on any Habitat Sites. A negligible impact on Habitat Sites is consequently expected.
0	SSSIs	M	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	A/M	There are no Ancient Woodlands in proximity to the New Settlement.
0	LNRs	-	There are no NNRs in proximity to the New Settlement.
--	LWSs	A	<p>A major negative impact would be expected as the New Settlement coincides with multiple LWS's including: 'Brome Hall Lane', 'Turners End Marsh'; and 'The Long Meadow'.</p> <p><i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i></p>
0	LGS	-	The New Settlement does not coincide with any LGSs.
-	Priority Habitats	A	<p>A minor negative impact would be expected as the New Settlement coincides with deciduous woodland, traditional orchard and good-quality semi-improved grassland.</p> <p><i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i></p>

D.4.4 SA Objective 4: Landscape

Table D.4.4: The assessment of New Settlement at 'C1' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	C1: Description of effect
0	National Landscapes/AONBs	-	Located approximately 23km from the Cotswolds NL. Development in this New Settlement would be unlikely to significantly impact the AONB.
-	Landscape Character	M	Located within Arden - Wooded Estatelands/Arden Parklands. Arden is seen as a historic landscape with wooded pasture and heath, ancient woodlands and mature hedgerow oaks. The New Settlement could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
0	Landscape Sensitivity	-	<i>Development proposals located within areas of 'low' sensitivity as identified in the Landscape Sensitivity Analysis. A negligible impact is expected on landscape sensitivity.</i>
0	Special Landscape Areas	-	Development proposals not located anywhere close to an SLA e.g., beyond the visual envelope of the SLA. A negligible impact is expected on SLAs.
0	Country Parks	-	There are no Country Parks in proximity to the New Settlement.
-	Views for PRoW Users	M	Coincides with PRoW footpaths across the New Settlement. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths would be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	This New Settlement is likely to lead to coalescence between Kingswood and Turner's Green. A minor negative impact on risk of coalescence is expected following development at this New Settlement. <i>Mitigation: Mitigate through the layout and design of open space and to create a new settlement edge.</i>

D.4.5 SA Objective 5: Cultural Heritage

Table D.4.5: The assessment of New Settlement at 'C1' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	C1: Description of effect
0	Grade I Listed Building	-	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
0	Grade II* Listed Building	-	Not located in proximity to any Grade II* Listed Buildings.
--	Grade II Listed Building	A	A major negative impact would be expected as the New Settlement coincides with multiple Grade II Listed Buildings including: 'Brome Hill Farmhouse'; 'Weston Hall Farm'; and 'Windmill Farmhouse'. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i>
0	Conservation Area	-	Not located in proximity to any Conservation Areas.
-	Scheduled Monument	A/M	The New Settlement is located within the setting of 'Baddesley Clinton Hall moated site and fishponds'. A minor negative impact would be expected on the setting of this Scheduled Monument.

Score	SA5: Receptor	Mitigation potential	C1: Description of effect
			<i>Mitigation: Avoid or mitigate impacts through the New Settlement, design and layout of future proposals.</i>
-	Registered Parks and Gardens	A/M	The New Settlement is located approximately 500m from 'Baddesley Clinton Hall' RPG. A minor negative impact would be expected on the setting of this RPG. <i>Mitigation: Avoid or mitigate impacts through the New Settlement, design and layout of future proposals.</i>
0	Local Archeological Record Site	-	Not located in proximity to any Local Archeological Record Sites.

D.4.6 SA Objective 6: Pollution

Table D.4.6: The assessment of New Settlement at 'C1' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	C1: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact could be expected as the New Settlement coincides with the M40. Development would be likely to expose some end users to higher levels of transport-associated air and noise pollution. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
-	Railway Line	A/M	A railway line coincides with the New Settlement, with development at likely to expose some end users to higher levels of transport-associated air and noise pollution, resulting in a minor negative impact. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.
-	Watercourses	A/M	The New Settlement coincides with the 'Grand Union canal; Warwick to Solihull' and the 'South Stratford canal'. A minor negative impact on watercourse quality could be expected upon development at this New Settlement. <i>Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.</i>

D.4.7 SA Objective 7: Natural Resources

Table D.4.7: The assessment of New Settlement at 'C1' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	C1: Description of effect
--	ALC Grade	M/X	The New Settlement has approximately 230ha located on ALC Grade 3 land. If the land in the New Settlement is found to be Grade 3a there would be a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources would be expected as the majority of the New Settlement coincides

Score	SA7: Receptor	Mitigation potential	C1: Description of effect
			with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

D.4.8 SA Objective 8: Waste

Table D.4.8: The assessment of New Settlement at 'C1' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	C1: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 6,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon, and a major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

D.4.9 SA Objective 9: Housing

Table D.4.9: The assessment of New Settlement at 'C1' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	C1: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 6,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

D.4.10 SA Objective 10: Health

Table D.4.10: The assessment of New Settlement at 'C1' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	C1: Description of effect
-	NHS Hospital with A&E Department	M	The nearest hospital with A&E services is the 'Warwick Hospital', located approximately 4.8km to the east. This New Settlement lies outside the sustainable distance to access A&E services. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to Leisure Facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest Leisure Facilities for these services.</i>

Score	SA10: Receptor	Mitigation potential	C1: Description of effect
0	AQMA	-	The New Settlement is not within or in close proximity to an AQMA.
-	Main Road	A/M	A minor negative impact on health would be expected as the New Settlement coincides with the M40. Development would be likely to expose some end users to higher levels of transport-associated air and noise pollution. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
++	Access to Greenspace	-	A major positive impact on health would be expected as the majority of the New Settlement is located within the target distance to one or more greenspaces and has the potential for greenspace provision.
+	PRoW / Cycle Path	-	Located within target distance to the PRoW network. A minor positive impact on the health and wellbeing is expected at this New Settlement.

D.4.11 SA Objective 11: Accessibility

Table D.4.11: The assessment of New Settlement at 'C1' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	C1: Description of effect
-	Bus Stop	M	A minor negative impact could be expected as the New Settlement is located outside of the target distance to a bus stop providing regular services. <i>Mitigation: Public transport improvement schemes and active travel measures.</i>
++	Railway Station	-	The majority of the New Settlement is located within the sustainable target distance to a railway station, approximately 390m from 'Lapworth Station'. A major positive impact on site end users' access to rail services is expected.
0	Connectivity	-	The New Settlement development proposal is located in an area identified to have moderate connectivity (Grade C). A negligible impact on connectivity would be expected.
+	Food stores	-	The New Settlement is within the sustainable target distance to 'The Village Shop' food store. A minor positive impact on access to food stores would be expected.

D.4.12 SA Objective 12: Education

Table D.4.12: The assessment of New Settlement at 'C1' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	C1: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the New Settlement coincides with 'Lapworth C of E Primary School'.
-	Access to Secondary School	M	A minor negative impact would be expected as the New Settlement is approximately 4.4km from the nearest secondary school. <i>Mitigation: Improvements to sustainable public transport and active travel measures may improve access to secondary educational facilities at the New Settlement.</i>
+	Access to Further Education	-	The New Settlement is located within the sustainable target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

D.4.13 SA Objective 13: Economy

Table D.4.13: The assessment of New Settlement at 'C1' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	C1: Description of effect
+/-	Employment Floorspace Provision	-	The New Settlement currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlement could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy would be expected as the New Settlement is within the target distance to various employment opportunities.

D.5 E1

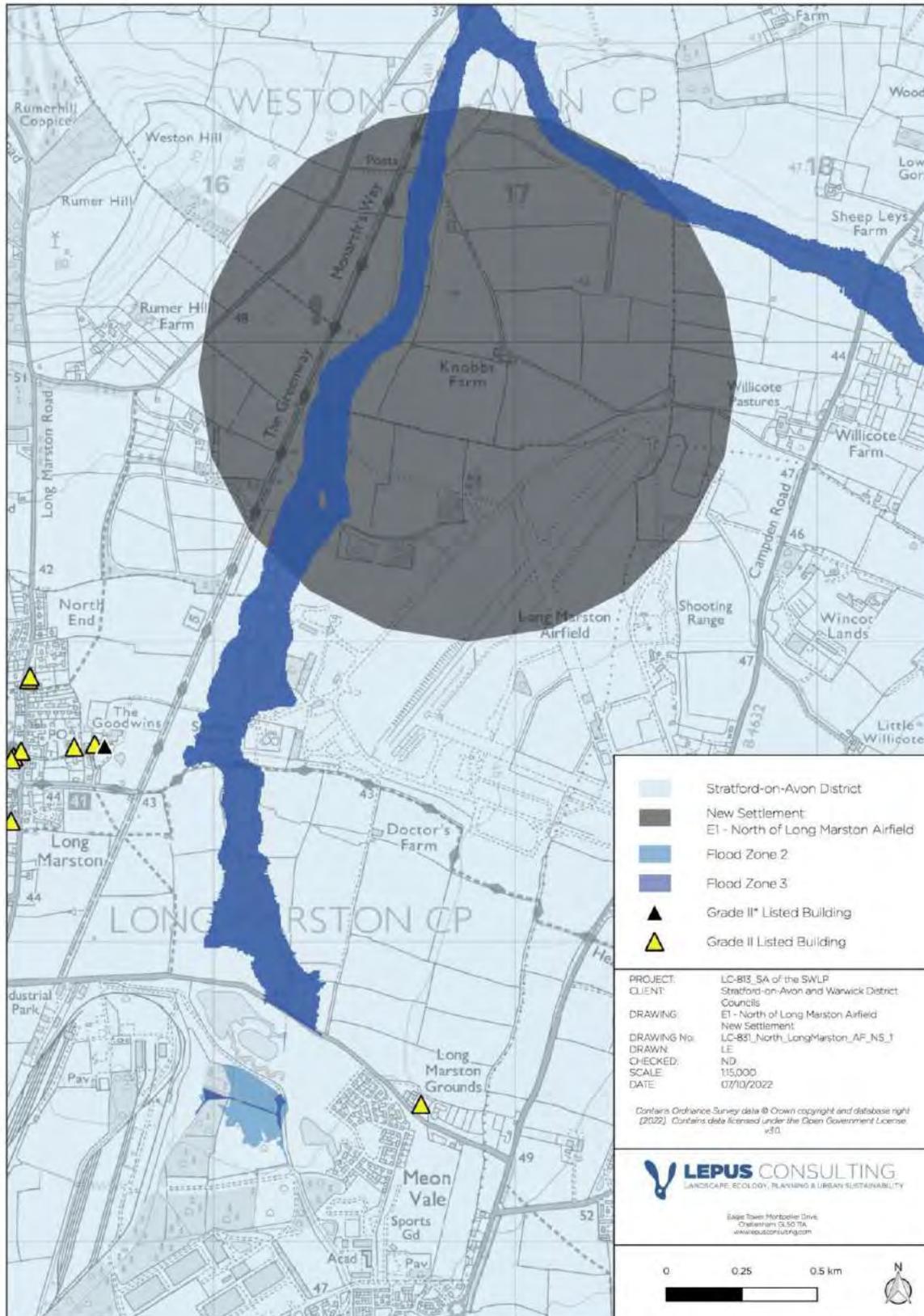


Figure D.5.1: New Settlement at 'E1' with selected constraints.

D.5.1 SA Objective 1: Climate Change

Table D.5.1: The assessment of New Settlement at 'E1' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	E1: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this New Settlement could deliver approximately 6,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The New Settlements have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

D.5.2 SA Objective 2: Flood Risk

Table D.5.2: The assessment of New Settlement at 'E1' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	E1: Description of effect
0	Riparian Flood Zones	-	The New Settlement has less than 10% of the BL coincides with Flood Zones 2 or 3. A negligible impact on risk from riparian flooding would be expected.
-	Surface Water Flood Risk	M	<p>Less than 50% but more than 10% of the New Settlement coincides with areas at high risk of surface water flooding. A minor negative impact would be expected for surface water flood risk.</p> <p><i>Mitigation: Implementation of SuDS and GI within the layout and design of the development.</i></p>

D.5.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table D.5.3: The assessment of New Settlement at 'E1' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	E1: Description of effect
0	Habitats Sites	-	Development at the New Settlement is not expected to result in adverse impacts on any Habitat Sites. A negligible impact on Habitat Sites is consequently expected.
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	Not located within proximity to any Ancient Woodlands.
0	LNRs	-	There are no LNRs located in proximity of the New Settlement.
--	LWSs	A	<p>A major negative impact would be expected as the New Settlement coincides with multiple LWS's including: 'The Greenway Meadow'; 'Marchfont Brook Corridor'; and 'Long Marston Disused Airfield'.</p> <p><i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i></p>
0	LGS	-	The New Settlement does not coincide with any LGSs.
-	Priority Habitats	A/M	A minor negative impact would be expected as the New Settlement coincides with 'deciduous woodland'.

Score	SA3: Receptor	Mitigation potential	E1: Description of effect
			<i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

D.5.4 SA Objective 4: Landscape

Table D.5.4: The assessment of New Settlement at 'E1' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	E1: Description of effect
-	National Landscapes/AONBs	M	New settlement located approximately 2.5km from 'Cotswolds AONB'. Development in this New Settlement would be expected to induce a minor negative impact on the setting and views attributed to this AONB. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Landscape Character	M	Located within the 'Feldon – Vale Farmlands' Character Area. Feldon is a lowland agricultural region, characterised by heavy clay soils and nucleated settlements of small rural villages. The New Settlement could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	M	The New Settlement coincides with less than 50% high or high-medium sensitivity and includes areas of 'medium' or 'medium-low' sensitivity as identified in the Landscape Sensitivity Analysis. A minor negative impact on sensitive landscapes would be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Special Landscape Areas	-	New Settlement does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRoW Users	M	Long distance route Monarch's way will be affected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
0	Coalescence	-	This New Settlement is unlikely to lead to coalescence between settlements.

D.5.5 SA Objective 5: Cultural Heritage

Table D.5.5: The assessment of New Settlement at 'E1' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	E1: Description of effect
0	Grade I Listed Building	-	Not located within proximity to any Grade I Listed Buildings.
0	Grade II* Listed Building	-	Not located within proximity to any Grade II* Listed Buildings.
0	Grade II Listed Building	-	Not located within proximity to any Grade II Listed Buildings.
0	Conservation Area	-	Not located within proximity to any Conservation Areas.
0	Scheduled Monument	-	Not located within proximity to any Scheduled Monuments.
0	Registered Parks and Gardens	-	Not located within proximity to any RPGs.

Score	SA5: Receptor	Mitigation potential	E1: Description of effect
0	Local Archeological Record Site	-	Not located in proximity to any Local Archaeological Record Sites.

D.5.6 SA Objective 6: Pollution

Table D.5.6: The assessment of New Settlement at 'E1' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	E1: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
0	Railway Line	-	Not within 200m of a railway line.
0	Groundwater SPZ	-	Not within a Groundwater SPZ.
-	Watercourses	A	The New Settlement coincides with 'Marchfont Brook'. A minor negative impact on watercourse quality would be expected as a result of development at this New Settlement. <i>Mitigation: Appropriate management of construction and incorporate SuDS and GI to reduce impacts during the operation of the development.</i>

D.5.7 SA Objective 7: Natural Resources

Table D.5.7: The assessment of New Settlement at 'E1' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	E1: Description of effect
--	ALC Grade	M/X	The New Settlement has approximately 150ha located on ALC Grade 3 land. If the land in the New Settlement is found to be Grade 3a there would be a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
0	Mineral Safeguarding Areas	-	Not located within an MSA.

D.5.8 SA Objective 8: Waste

Table D.5.8: The assessment of New Settlement at 'E1' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	E1: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 6,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon, and a major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

D.5.9 SA Objective 9: Housing

Table D.5.9: The assessment of New Settlement at 'E1' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	E1: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 6,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

D.5.10 SA Objective 10: Health

Table D.5.10: The assessment of New Settlement at 'E1' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	E1: Description of effect
-	NHS Hospital with A&E Department	M	The New Settlement is located approximately 14.2km from Warwick Hospital. Development at this New Settlement could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to a GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to a Leisure Facility. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest Leisure Facility for these services.</i>
0	AQMA	-	Not located within 200m of an AQMA.
0	Main Road	-	Not located within 200m of a main road.
+	Access to Greenspace	-	A minor positive impact on health would be expected as the New Settlement is located within the target distance to one or more greenspaces and has the potential for greenspace provision.
+	PRoW / Cycle Path	-	Located within target distance to the PRoW and cycle network. A minor positive impact on the health and wellbeing is expected.

D.5.11 SA Objective 11: Accessibility

Table D.5.11: The assessment of New Settlement at 'E1' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	E1: Description of effect
-	Bus Stop	M	A minor negative impact would be expected as the New Settlement is located over 400m from a bus stop with regular services. <i>Mitigation: Public transport improvement schemes and active travel measures.</i>
-	Railway Station	M	A minor negative impact would be expected as the New Settlement is located over 2km from a national network railway station. <i>Mitigation: Public transport improvement schemes and active travel measures.</i>

Score	SA11: Receptor	Mitigation potential	E1: Description of effect
0	Connectivity	-	The New Settlement is located in an area identified to have moderate connectivity (Grade C). a negligible impact on connectivity would be expected at this New Settlement.
-	Food stores	M	The New Settlement is outside of the sustainable target distance to a food store. A minor negative impact on access to food stores would be expected. <i>Mitigation: Improvements to access to sustainable public transport and active travel measures may increase the potential for local residents to access local food stores.</i>

D.5.12 SA Objective 12: Education

Table D.5.12: The assessment of New Settlement at 'E1' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	E1: Description of effect
-	Access to Primary School	M	A minor negative impact would be expected as the New Settlement is approximately 1.5km from the nearest primary school. <i>Mitigation: Improvements to sustainable public transport and active travel measures may improve access to primary educational facilities at the New Settlement.</i>
-	Access to Secondary School	M	A minor negative impact would be expected as the New Settlement is approximately 3km from the nearest secondary school. <i>Mitigation: Improvements to sustainable public transport and active travel measures may improve access to secondary educational facilities at the New Settlement.</i>
+	Access to Further Education	-	The New Settlement is located within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

D.5.13 SA Objective 13: Economy

Table D.5.13: The assessment of New Settlement at 'E1' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	E1: Description of effect
+/-	Employment Floorspace Provision	-	The New Settlement currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlement could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this New Settlement is uncertain.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the New Settlement is within the target distance to various employment opportunities.

D.6 F1

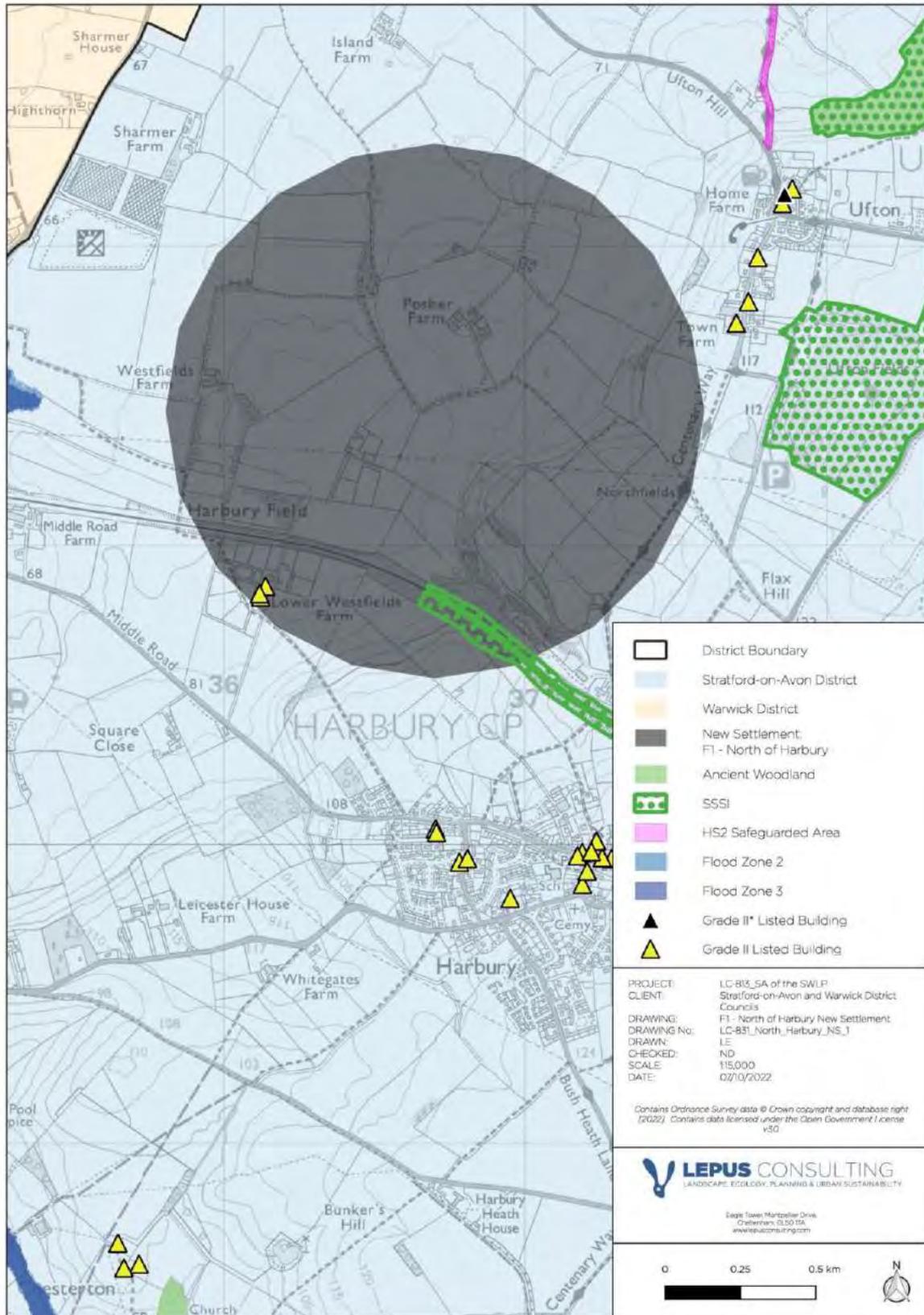


Figure D.6.1: New Settlement at 'F1' with selected constraints.

D.6.1 SA Objective 1: Climate Change

Table D.6.1: The assessment of New Settlement at 'F1' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	F1: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this New Settlement could deliver approximately 6,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The New Settlements have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

D.6.2 SA Objective 2: Flood Risk

Table D.6.2: The assessment of New Settlement at 'F1' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	F1: Description of effect
+	Riparian Flood Zones	-	The New Settlement is located entirely within Flood Zone 1 with 0% in risk of riparian flooding. A minor positive impact is expected.
0	Surface Water Flood Risk	-	Less than 10% of the New Settlement coincides with areas at high risk of surface water flooding. A negligible impact on surface water flood risk is expected following development at the New Settlement.

D.6.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table D.6.3: The assessment of New Settlement at 'F1' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	A1: Description of effect
0	Habitats Sites	-	Development at the New Settlement is not expected to result in adverse impacts on any Habitat Sites. A negligible impact on Habitat Sites is consequently expected.
-	SSSIs	M	<p>The New Settlement is located within an Impact Risk Zone which requires consultation with Natural England for 'Residential development 100 units or more/Any residential development of 50 or more houses outside existing settlements/urban areas'.</p> <p><i>Mitigation: Consult with Natural England</i></p>
0	NNRs	-	There are no NNRs in proximity to the New Settlement.
0	Ancient Woodland	-	There are no ancient woodlands in proximity to the New Settlement.
-	LNRs	M	<p>The New Settlement is located approximately 210m from 'Ufton Fields' LNR. A minor negative impact on this LNR would be expected following development at this New Settlement.</p> <p><i>Mitigation: Avoid impacts through the design and layout of future proposals.</i></p>
--	LWSs	A	<p>The New Settlement coincides with LWS's 'North Fields' and 'Land adjacent to SSSI'. A major negative impact would be expected on these LWSs as a result of development at the New Settlement.</p> <p><i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i></p>

Score	SA3: Receptor	Mitigation potential	A1: Description of effect
0	LGS	-	The New Settlement does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact would be expected as the New Settlement coincides with 'deciduous woodland'. <i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

D.6.4 SA Objective 4: Landscape

Table D.6.4: The assessment of New Settlement at 'F1' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	F1: Description of effect
0	National Landscapes/AONBs	-	Located approximately 12km from the Cotswolds AONB. Development in this New Settlement would be unlikely to significantly impact the AONB.
-	Landscape Character	M	Located within the 'Feldon – Lias Village Farmlands' Character Area. Feldon is a lowland agricultural region, characterised by heavy clay soils and nucleated settlements of small rural villages. The New Settlement could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
0	Landscape Sensitivity	-	Development proposals located within areas of 'low' sensitivity as identified in the Landscape Sensitivity Analysis.
0	Special Landscape Areas	-	New Settlement does not coincide with an SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides with a PRow footpath in the east of the location. A minor negative impact on the recreational experience associated with footpaths within the site would be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	Development in this New Settlement could increase the risk of coalescence between Ufton and Harbury, which would be expected to have a minor negative impact on the surrounding landscape. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

D.6.5 SA Objective 5: Cultural Heritage

Table D.6.5: The assessment of New Settlement at 'F1' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	F1: Description of effect
0	Grade I Listed Building	-	There are no Grade I Listed Building in proximity of the New Settlement.
0	Grade II* Listed Building	-	Not located in proximity to any Grade I Listed Buildings.
--	Grade II Listed Building	A	Potential major negative impacts on the settings of Grade II Listed Buildings 'Barn and Stable approximately 30m North of Lower Westfields Farmhouse', 'Former Dairy and Cheeseroom', approximately 1.25m North of 'Lower Westfields Farmhouse' and 'Lower Westfields Farmhouse', which coincide with the New Settlement.

Score	SA5: Receptor	Mitigation potential	F1: Description of effect
			<i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i>
-	Conservation Area	A/M	The New Settlement is located approximately 470m from the 'Harbury' Conservation Area. A minor negative impact would be expected on this Conservation Area as a result of development at this location. <i>Mitigation: Avoid or mitigate impacts through appropriate design and layout of future proposals.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monuments.
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Local Archeological Record Site	-	Not located in proximity to any Local Archaeological Record Sites.

D.6.6 SA Objective 6: Pollution

Table D.6.6: The assessment of New Settlement at 'F1' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	F1: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not located within 200m of a main road.
-	Railway Line	M	A railway line coincides with the New Settlement, with development at likely to expose some end users to higher levels of transport-associated air and noise pollution, resulting in a minor negative impact. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.
0	Watercourses	-	Not located within 200m of a watercourse.

D.6.7 SA Objective 7: Natural Resources

Table D.6.7: The assessment of New Settlement at 'F1' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	F1: Description of effect
--	ALC Grade	M/X	The New Settlement has approximately 225ha located on ALC Grade 3 land. If the land in the New Settlement is found to be Grade 3a there would be a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources would be expected as the majority of the New Settlement coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

D.6.8 SA Objective 8: Waste

Table D.6.8: The assessment of New Settlement at 'F1' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	F1: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 6,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon, and a major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

D.6.9 SA Objective 9: Housing

Table D.6.9: The assessment of New Settlement at 'F1' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	F1: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 6,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

D.6.10 SA Objective 10: Health

Table D.6.10: The assessment of New Settlement at 'F1' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	F1: Description of effect
-	NHS Hospital with A&E Department	M	The New Settlement is located approximately 8.2km from Warwick Hospital. Development at this New Settlement could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	The New Settlement is within the target distance to a GP Surgery. A minor positive impact on access to GP surgeries would be expected following the development of the New Settlement.
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to a Leisure Facility. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest Leisure Facility for these services.</i>
0	AQMA	-	Not located within 200m of an AQMA.
0	Main Road	-	Not located within 200m of a main road.
+	Access to Greenspace	-	A minor positive impact on health would be expected as the New Settlement is located within the target distance to one or more greenspaces and has the potential for greenspace provision.
+	PRoW / Cycle Path	-	Located within target distance to the PRoW network. A minor positive impact on the health and wellbeing is expected.

D.6.11 SA Objective 11: Accessibility

Table D.6.11: The assessment of New Settlement at 'F1' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	F1: Description of effect
-	Bus Stop	M	A minor negative impact would be expected as the New Settlement is located approximately 470m from a bus stop providing regular services. <i>Mitigation: Improvements to sustainable public transport and active travel measures.</i>
-	Railway Station	M	The New Settlement is located over 2km from a national network railway station. A minor negative impact on access to rail networks would be expected. <i>Mitigation: Improvements to sustainable public transport and active travel measures.</i>
0	Connectivity	-	Development proposal is located in an area identified to have moderate connectivity (Grade C). A negligible impact would be expected on connectivity following development of this location.
+	Food stores	-	The New Settlement is within the target distance to a food store, approximately 760m from 'Cooperative Food'. A minor positive impact would be expected on access to food stores for site end users.

D.6.12 SA Objective 12: Education

Table D.6.12: The assessment of New Settlement at 'F1' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	F1: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the majority of the New Settlement coincides with 'Harbury C of E Primary School'.
-	Access to Secondary School	M	A minor negative impact would be expected as the New Settlement is approximately 2.5km from the nearest secondary school. <i>Mitigation: Improvements to sustainable public transport and active travel measures may improve access to secondary educational facilities at the New Settlement.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

D.6.13 SA Objective 13: Economy

Table D.6.13: The assessment of New Settlement at 'F1' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	F1: Description of effect
+/-	Employment Floorspace Provision	-	The New Settlement currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlement could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy would be expected as the New Settlement is within the target distance to various employment opportunities.

D.7 F2

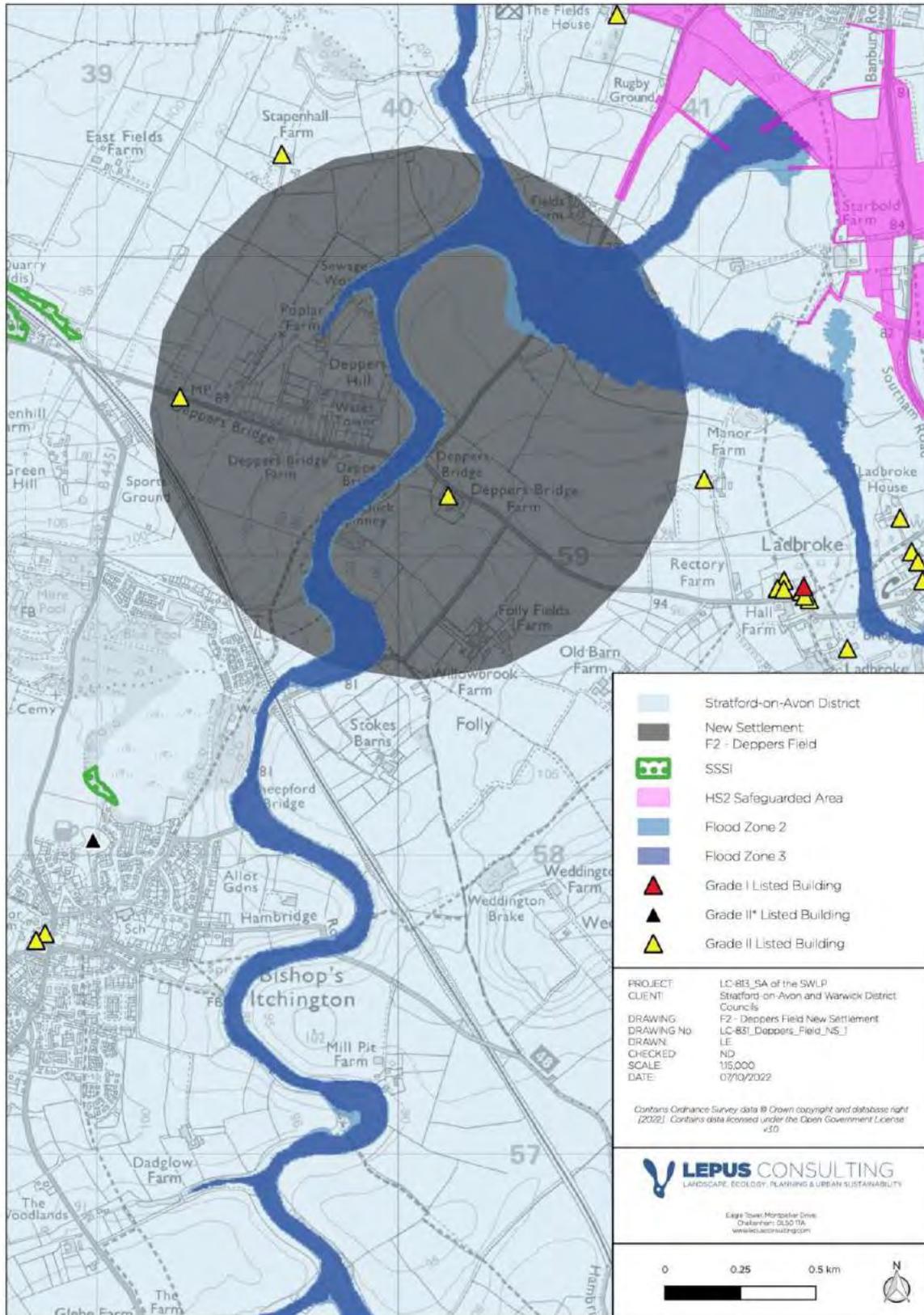


Figure D.7.1: New Settlement at 'F2' with selected constraints.

D.7.1 SA Objective 1: Climate Change

Table D.7.1: The assessment of New Settlement at 'F2' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	F2: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this New Settlement could deliver approximately 6,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The New Settlements have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

D.7.2 SA Objective 2: Flood Risk

Table D.7.2: The assessment of New Settlement at 'F2' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	A1: Description of effect
-	Riparian Flood Zones	A/M	<p>More than 10% but less than 50% of the New Settlement coincides with Flood Zone 2 and 3. Approximately 18% is in Flood Zone 2 and 16% in Flood Zone 3. A minor negative impact would be expected on flood risk at this location.</p> <p><i>Mitigation: Avoid through layout design and location or mitigate through the use of SuDS and GI.</i></p>
0	Surface Water Flood Risk	-	<p>Less than 10% of the New Settlement coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected.</p>

D.7.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table D.7.3: The assessment of New Settlement at 'F2' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	F2: Description of effect
0	Habitats Sites	-	<p>Development at the New Settlement is not expected to result in adverse impacts on any Habitat Sites. A negligible impact on Habitat Sites is consequently expected.</p>
0	SSSIs	-	<p>Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.</p>
0	NNRs	-	<p>There are no NNRs in proximity to the location.</p>
0	Ancient Woodland	-	<p>There are no ancient woodlands in proximity to the New Settlement.</p>
0	LNRs	-	<p>There are no LNRs located in proximity of the New Settlement.</p>
--	LWSs	A	<p>A major negative impact would be expected as the New Settlement coincides with multiple LWS's including: 'Deppers Bridge Meadow'; 'Deppers Bridge Farm'; and 'Poplar Farm Meadow'.</p> <p><i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i></p>
0	LGS	-	<p>The New Settlement does not coincide with any LGSs.</p>
-	Priority Habitats	A	<p>A minor negative impact could be expected as small proportions of the New Settlement coincides with 'deciduous woodland' and 'good-quality semi-improved grassland'.</p>

Score	SA3: Receptor	Mitigation potential	F2: Description of effect
			<i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

D.7.4 SA Objective 4: Landscape

Table D.7.4: The assessment of New Settlement at 'F2' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	F2: Description of effect
0	National Landscapes/AONBs	-	Located approximately 10km from the Cotswolds AONB. Development in this New Settlement would be unlikely to significantly impact the AONB.
-	Landscape Character	M	Located within 'Feldon - Lias Village Farmlands/Enhancement Zone'. Feldon is a lowland agricultural region, characterised by heavy clay soils and nucleated settlements of small rural villages. The New Settlement could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
--	Landscape Sensitivity	A	Development coincides substantially with areas of 'high' or 'high-medium' sensitivity as identified in the SoADC Landscape Sensitivity Analysis. A major negative impact on sensitive landscapes would consequently be expected. <i>Mitigation: Avoid through location layout and design.</i>
0	Special Landscape Areas	-	Development proposals not located anywhere close to an SLA e.g., beyond the visual envelope of the SLA.
0	Country Parks	-	Not located in close proximity to a Country Park.
-	Views for PRow Users	M	Coincides PRow footpaths from the south to the centre of the New Settlement. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths would be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	This New Settlement is likely to decrease the separation between Bishops Itchington and Southam. A minor negative impact would be expected on the risk of coalescence as a result of development at this New Settlement. <i>Mitigation: Creation of a robust settlement edge through layout and design of the location.</i>

D.7.5 SA Objective 5: Cultural Heritage

Table D.7.5: The assessment of New Settlement at 'F2' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	F2: Description of effect
0	Grade I Listed Building	-	There are no Grade I Listed Buildings in proximity of the New Settlement.
0	Grade II* Listed Building	-	There are no Grade II* Listed Buildings in proximity of the New Settlement.
--	Grade II Listed Building	A	Potential major negative impact on the settings of various Grade II Listed Buildings as the New Settlement coincides with 'Deppers Bridge Farmhouse' and 'Milestone at National Grid Ref SP 3928 5935'. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i>

Score	SA5: Receptor	Mitigation potential	F2: Description of effect
-	Conservation Area	A	A minor negative impact would be expected as the New Settlement is located approximately 470m from the 'Harbury' CA and is separated by greenfield and undeveloped land. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monuments.
0	Registered Parks and Gardens	M	Not located in proximity to any Registered Parks and Gardens.
0	Local Archeological Record Site	M	Not located in proximity to any Local Archaeological Record Sites.

D.7.6 SA Objective 6: Pollution

Table D.7.6: The assessment of New Settlement at 'F2' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	F2: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
-	Railway Line	M	A railway line coincides with the New Settlement, with development at likely to expose some end users to higher levels of transport-associated air and noise pollution, resulting in a minor negative impact. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.
-	Watercourses	M	The New Settlement coincides with the River Itchen. There is potential for a minor negative impact on watercourse quality following development at this location. <i>Mitigation: Appropriate management of construction and incorporate SuDS and GI to reduce impacts during the operation of the development.</i>

D.7.7 SA Objective 7: Natural Resources

Table D.7.7: The assessment of New Settlement at 'F2' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	F2 Description of effect
--	ALC Grade	M/X	The New Settlement has approximately 175ha located on ALC Grade 3 land. If the land in the New Settlement is found to be Grade 3a there would be a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>
-	Mineral Safeguarding Areas	M/X	A minor negative impact on natural resources would be expected as the majority of the New Settlement coincides with an MSA, where consultation is required prior to development. <i>Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversible uses.</i>

D.7.8 SA Objective 8: Waste

Table D.7.8: The assessment of New Settlement at 'F2' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	F2: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 6,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon, and a major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

D.7.9 SA Objective 9: Housing

Table D.7.9: The assessment of New Settlement at 'F2' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	F2: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 6,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

D.7.10 SA Objective 10: Health

Table D.7.10: The assessment of New Settlement at 'F2' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	F2: Description of effect
-	NHS Hospital with A&E Department	M	The New Settlement is located approximately 13.2km from Warwick Hospital. Development at this New Settlement could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
-	Access to GP Surgery	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to GP Surgery. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.</i>
-	Access to Leisure Facilities	M	A minor negative impact could be expected as the New Settlement is outside of the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure centres for these services.</i>
0	AQMA	-	The New Settlement is not within or in close proximity to an AQMA.
0	Main Road	-	Not within 200m of a main road.
++	Access to Greenspace	-	A major positive impact on health would be expected as the majority of the New Settlement is located within the target distance to one or more greenspaces and has the potential for greenspace provision.

Score	SA10: Receptor	Mitigation potential	F2: Description of effect
+	PRoW / Cycle Path	-	Located within target distance to the PRoW network but no connectivity exists to the cycle network. A minor positive impact on the health and wellbeing is expected.

D.7.11 SA Objective 11: Accessibility

Table D.7.11: The assessment of New Settlement at 'F2' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	F2: Description of effect
+	Bus Stop	-	A minor positive impact on end users' access to sustainable transport is expected as the majority of the New Settlement is within the target distance to a bus stop providing regular services.
-	Railway Station	M	The New Settlement is located over 2km from a national network railway station. A minor negative impact on access to rail networks would be expected. <i>Mitigation: Improvements to sustainable public transport and active travel measures.</i>
0	Connectivity	-	Development proposal is located in an area identified to have moderate connectivity (Grade C). A negligible impact on connectivity would be expected.
-	Food stores	M	The New Settlement is located approximately 1.2km from the nearest local food store. Consequently, a minor negative impact would be expected on site end users' access to these local services. <i>Mitigation: Improvements to sustainable public transport and active travel measures.</i>

D.7.12 SA Objective 12: Education

Table D.7.12: The assessment of New Settlement at 'F2' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	F2: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the New Settlement is within the sustainable target distance of 'Bishops Itchington Primary School'.
-	Access to Secondary School	M	A minor negative impact would be expected as the New Settlement is approximately 800m outside of the sustainable target distance to the nearest secondary school. <i>Mitigation: Potential for secondary education provisions within the New Settlement layout.</i>
+	Access to Further Education	-	Wholly within the target distance to post-16 (further) education. A minor positive impact on access to these educational facilities would be expected.

D.7.13 SA Objective 13: Economy

Table D.7.13: The assessment of New Settlement at 'F2' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	F2: Description of effect
+/-	Employment Floorspace Provision	-	The New Settlement currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlement could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.

Score	SA13: Receptor	Mitigation potential	F2: Description of effect
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the New Settlement is within the target distance to various employment opportunities.

D.8 F3

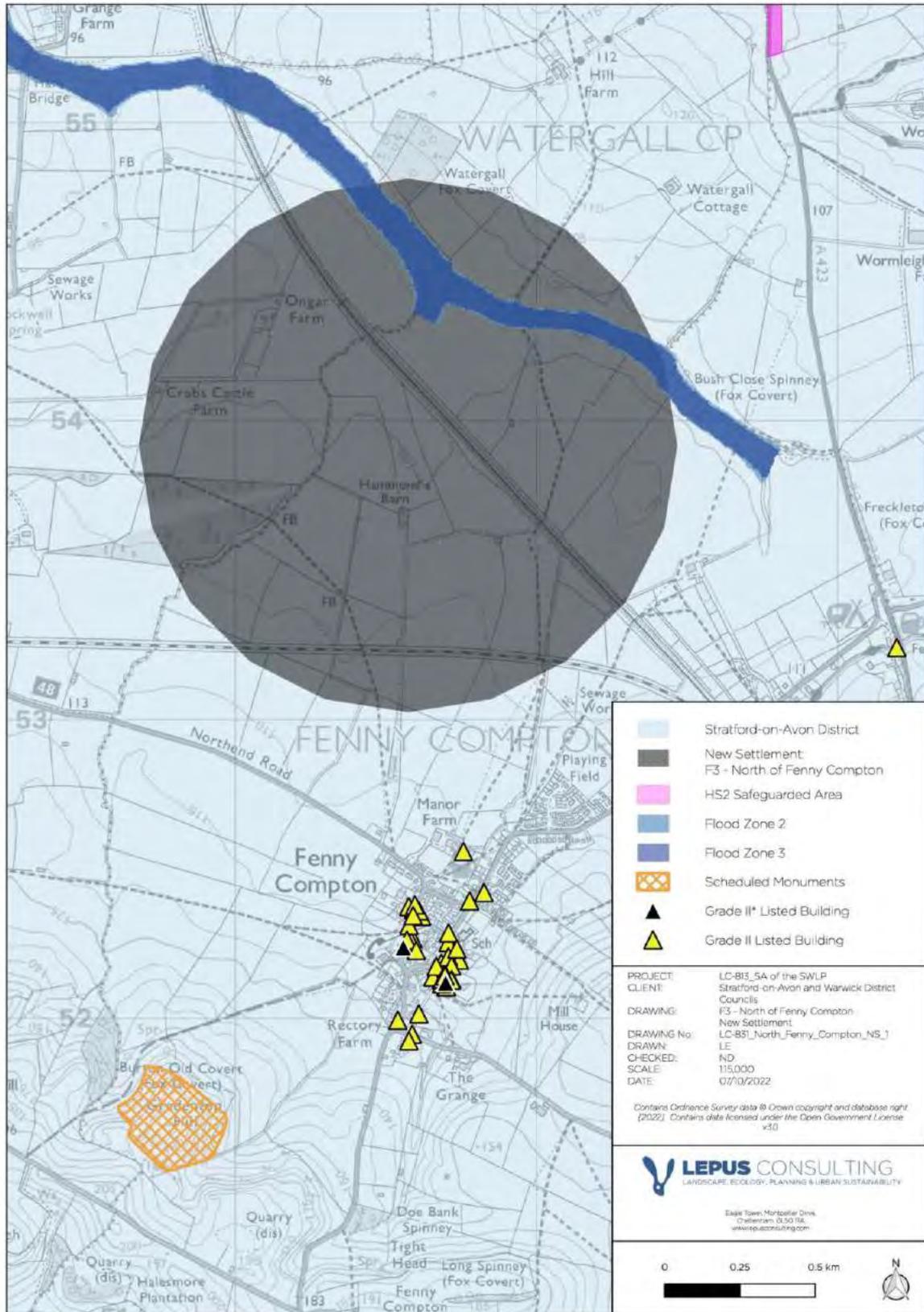


Figure D.8.1: New Settlement at 'F3' with selected constraints.

D.8.1 SA Objective 1: Climate Change

Table D.8.1: The assessment of New Settlement at 'F3' against SA Objective 1 (Climate Change)

Score	SA1: Receptor	Mitigation potential	F3: Description of effect
--	Potential Increase in Carbon Footprint	M	<p>Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this New Settlement could deliver approximately 6,000 or more dwellings and could increase carbon emissions in the District by more than 1% and result in a major negative impact.</p> <p><i>Mitigation: The New Settlements have been identified with the intention of supporting 20-minute neighbourhoods and reducing the need to travel to meet daily needs, seeking to reduce transport-related GHG emissions.</i></p> <p><i>Future policies in the SWLP will seek to reduce GHG emissions associated with the construction and operation of homes.</i></p> <p><i>The incorporation of GI into the any future proposals has the potential to retain soils and vegetation in these areas and introduce additional planting that would help to adapt the development to the risks of future climate change.</i></p>

D.8.2 SA Objective 2: Flood Risk

Table D.8.2: The assessment of New Settlement at 'F3' against SA Objective 2 (Flood Risk)

Score	SA2: Receptor	Mitigation potential	F3: Description of effect
0	Riparian Flood Zones	-	Less than 10% of the New Settlement coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the New Settlement.
-	Surface Water Flood Risk	M	<p>Less than 50% but more than 10% of the New Settlement coincides with areas at high risk of surface water flooding. A minor negative impact would be expected for surface water flood risk.</p> <p><i>Mitigation: Implementation of SuDS and GI within the layout and design of the development.</i></p>

D.8.3 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

Table D.8.3: The assessment of New Settlement at 'F3' against SA Objective 3 (Biodiversity, Fauna and Geodiversity)

Score	SA3: Receptor	Mitigation potential	F3: Description of effect
0	Habitats Sites	-	Development at the New Settlement is not expected to result in adverse impacts on any Habitat Sites. A negligible impact on Habitat Sites is consequently expected.
0	SSSIs	-	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.
0	NNRs	-	There are no NNRs in proximity to the location.
0	Ancient Woodland	-	Not located within proximity to an Ancient Woodland.
0	LNRs	-	There are no LNRs located in proximity of the New Settlement.
--	LWSs	A	<p>A major negative impact could be expected as the New Settlement coincides with multiple LWS's including: 'Deppers Bridge Meadow'; 'Deppers Bridge Farm'; and 'Poplar Farm Meadow'.</p> <p><i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i></p>
0	LGS	-	The New Settlement does not coincide with any LGSs.
-	Priority Habitats	A	A minor negative impact could be expected as small proportions of the New Settlement coincides with 'deciduous woodland' and 'good-quality semi-improved grassland'.

Score	SA3: Receptor	Mitigation potential	F3: Description of effect
			<i>Mitigation: Avoid impacts by retaining and enhancing Priority Habitats in layout of future proposals.</i>

D.8.4 SA Objective 4: Landscape

Table D.8.4: The assessment of New Settlement at 'F3' against SA Objective 4 (Landscape)

Score	SA4: Receptor	Mitigation potential	F3: Description of effect
0	National Landscapes/AONBs	-	Located approximately 5km from the Cotswolds AONB. Development in this New Settlement would be unlikely to significantly impact the AONB.
-	Landscape Character	M	Located within Feldon – Vale Farmlands Character Area. Feldon is a lowland agricultural region, characterised by heavy clay soils and nucleated settlements of small rural villages. The New Settlement could be discordant with this local character area. <i>Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.</i>
-	Landscape Sensitivity	M	Development coincides with less than 50% high or high-medium sensitivity and includes areas of 'medium' or 'medium-low' sensitivity as identified in the Landscape Sensitivity Analysis. <i>Mitigation: Impacts can be avoided by matching development types with landscapes that have good capacity for change without affecting character. Sensitive design in terms of New Settlement in the landscape, layout and building design can help to mitigate impacts on landscape character.</i>
-	Special Landscape Areas	M	The New Settlement is located approximately 500m from 'Ironstone Hill' SLA. A minor negative impact on this SLA may be expected following development at this location. <i>Mitigation: Sensitive design in terms of New Settlement in the landscape, layout and building design can help to mitigate impacts on Special Landscape Areas.</i>
-	Country Parks	M	The New Settlement is located approximately 1.5km from 'Burton Dasset' country park. A minor negative impact on this country park may be expected following development at this location. <i>Mitigation: Sensitive design in terms of New Settlement in the landscape, layout and building design can help to mitigate impacts on country parks.</i>
-	Views for PRow Users	M	Coincides with two PRowWs which run through the location. A minor negative impact on the recreational experience associated with this, and surrounding, footpaths could be expected. <i>Mitigation: Mitigate through use of landscape-led site design practices.</i>
-	Coalescence	M	The New Settlement would be likely to reduce the separation between the existing settlements Knightcote and Fenny Compton. A minor negative impact would be expected as a result of development at this location. <i>Mitigation: Mitigate through the layout and design to create a robust settlement edge.</i>

D.8.5 SA Objective 5: Cultural Heritage

Table D.8.5: The assessment of New Settlement at 'F3' against SA Objective 5 (Cultural Heritage)

Score	SA5: Receptor	Mitigation potential	F3: Description of effect
0	Grade I Listed Building	-	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
0	Grade II* Listed Building	-	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
0	Grade II Listed Building	-	Not located in proximity to any Grade II Listed Buildings.
-	Conservation Area	M	The New Settlement is located approximately 470m from the 'Fenny Compton' CA. A minor negative impact would be expected on the setting of this CA following development at this location. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals.</i>
0	Scheduled Monument	-	Not located in proximity to any Scheduled Monuments.
0	Registered Parks and Gardens	-	Not located in proximity to any Registered Parks and Gardens.
0	Local Archeological Record Site	-	Not located in proximity to any Local Archaeological Record Sites.

D.8.6 SA Objective 6: Pollution

Table D.8.6: The assessment of New Settlement at 'F3' against SA Objective 6 (Pollution)

Score	SA6: Receptor	Mitigation potential	F3: Description of effect
0	AQMA	-	Not located within or in close proximity to an AQMA.
0	Main Road	-	Not located within 200m of a main road.
-	Railway Line	A/M	A railway line coincides with the New Settlement, with development at likely to expose some end users to higher levels of transport-associated air and noise pollution, resulting in a minor negative impact. <i>Mitigation: Avoid impacts through the New Settlement and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.</i>
0	Groundwater SPZ	-	Not located within a Groundwater SPZ.
0	Watercourses	-	Not located within 200m of a watercourse.

D.8.7 SA Objective 7: Natural Resources

Table D.8.7: The assessment of New Settlement at 'F3' against SA Objective 7 (Natural Resources)

Score	SA7: Receptor	Mitigation potential	F3: Description of effect
--	ALC Grade	M/X	The New Settlement is entirely located on Grade 3 land. Development on Grade 3 land would lead to a major negative impact on loss of BMV soils. <i>Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.</i>

Score	SA7: Receptor	Mitigation potential	F3: Description of effect
0	Mineral Safeguarding Areas	-	The New Settlement does not coincide with an MSA.

D.8.8 SA Objective 8: Waste

Table D.8.8: The assessment of New Settlement at 'F3' against SA Objective 8 (Waste)

Score	SA8: Receptor	Mitigation potential	F3: Description of effect
--	Potential increase in household waste generation	M	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of over 6,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-on-Avon, and a major negative impact on waste could be expected. <i>Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.</i>

D.8.9 SA Objective 9: Housing

Table D.8.9: The assessment of New Settlement at 'F3' against SA Objective 9 (Housing)

Score	SA9: Receptor	Mitigation potential	F3: Description of effect
++	Housing provision	-	Residential-led development is likely to result in a net gain in housing. The provision of over 6,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

D.8.10 SA Objective 10: Health

Table D.8.10: The assessment of New Settlement at 'F3' against SA Objective 10 (Health)

Score	SA10: Receptor	Mitigation potential	F3: Description of effect
-	NHS Hospital with A&E Department	M	The New Settlement is located approximately 17.5km from Warwick Hospital. Development at this New Settlement could potentially have more restricted sustainable access to emergency healthcare and result in a minor negative impact. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.</i>
+	Access to GP Surgery	-	A minor positive impact would be expected as the New Settlement is within the target distance to a GP Surgery.
-	Access to Leisure Facilities	M	A minor negative impact would be expected as the New Settlement is located outside of the target distance to leisure facilities. <i>Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest leisure centres for these services.</i>
0	AQMA	-	The New Settlement is not within or in close proximity to an AQMA.
0	Main Road	-	The New Settlement is not within 200m of a main road.
+	Access to Greenspace	-	A minor positive impact on health would be expected as the New Settlement is located within the target distance to one

Score	SA10: Receptor	Mitigation potential	F3: Description of effect
			or more greenspaces and has the potential for greenspace provision.
+	PRoW / Cycle Path	-	Located within target distance to the PRoW network. A minor positive impact on the health and wellbeing is expected.

D.8.11 SA Objective 11: Accessibility

Table D.8.11: The assessment of New Settlement at 'F3' against SA Objective 11 (Accessibility)

Score	SA11: Receptor	Mitigation potential	F3: Description of effect
-	Bus Stop	M	A minor negative impact on end users' access to sustainable transport as the New Settlement is not located within the target distance to a bus stop providing regular services. <i>Mitigation: Public transport improvement schemes and improvements to active transport.</i>
-	Railway Station	M	The New Settlement is located over 2km from a national network railway station. A minor negative impact on access to rail networks would be expected. <i>Mitigation: Improvements to sustainable public transport and active travel measures.</i>
0	Connectivity	-	Development proposal is located in an area identified to have moderate connectivity (Grade C). A negligible impact on connectivity would be expected following development at this location.
+	Food stores	-	Located within the sustainable target distance to a food store, approximately 630m from 'Cooperative Food'. A minor positive impact on access to food stores would be expected.

D.8.12 SA Objective 12: Education

Table D.8.12: The assessment of New Settlement at 'F3' against SA Objective 12 (Education)

Score	SA12: Receptor	Mitigation potential	F3: Description of effect
+	Access to Primary School	-	A minor positive impact would be expected as the New Settlement coincides with 'The Dasset C of E Primary School'.
-	Access to Secondary School	M	A minor negative impact can be expected as this New Settlement is approximately 5.6km from the nearest secondary school. <i>Mitigation: Improvements to public transport and active travel networks may improve access to secondary educational facilities.</i>
-	Access to Further Education	M	The New Settlement is located outside of target distance to post-16 (further) education. A minor negative impact on access to these educational facilities would be expected. <i>Mitigation: Improvements to public transport and active travel networks may improve access to further educational facilities.</i>

D.8.13 SA Objective 13: Economy

Table D.8.13: The assessment of New Settlement at 'F3' against SA Objective 13 (Economy)

Score	SA13: Receptor	Mitigation potential	F3: Description of effect
+/-	Employment Floorspace Provision	-	The New Settlement currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of over 6,000 homes, the New Settlement could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents.
+	Access to Employment Opportunities	-	A minor positive impact on the local economy could be expected as the New Settlement is within the target distance to various employment opportunities.

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Appendix E: Assessment of Policy Options

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E.1 Introduction

E.1.1 Preface

- E.1.1.1 The South Warwickshire Councils have identified a range of policy options for consideration, as part of the Issues and Options Consultation for the emerging Local Plan. The policy options include those for delivering the area's economic and housing needs as well as covering various development management aspects.
- E.1.1.2 Policy options have been identified by the Councils for 38 of the 'Issues' identified within the Issues and Options document. This appendix provides an assessment of 116 policy options, associated with these 38 options.
- E.1.1.3 Several 'Issues' identified within the Issues and Options document do not have specific options identified, and so these have not been evaluated in the SA at this stage. This is explained in the relevant sections of this appendix.
- E.1.1.4 Each option appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**) and is in accordance with the methodology as set out in the SA Main Report.
- E.1.1.5 The assessments within this appendix are based on the policy options as presented in the South Warwickshire Local Plan Issues and Options Consultation document, with consultation scheduled for January 2023.
- E.1.1.6 The assessments have identified the best performing option for each policy where possible, or in some circumstances recommended that a combination of options could potentially result in the most sustainability benefits.

E.2 Meeting South Warwickshire’s Sustainable Development Needs

E.2.1 Issue I1: Sustainability Appraisal

E.2.1.1 This issue relates to the Sustainability Appraisal process and invites comments regarding the SA findings. There are no policy options for assessment.

E.2.2 Issue I2: Infrastructure Requirements and Delivery

Option I2a	Set out infrastructure requirements for all scales, types and location of development If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire.
Option I2b	Focus on the strategic infrastructure relating specifically to the growth strategy In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
I2a	+	0	++	+	0	0	+	0	+	+	++	+	+
I2b	+	0	++	+	0	0	+	0	+	+	++	+	+

E.2.2.1 In alignment with South Warwickshire’s aims for infrastructure provision to address issues relating to transport, utilities, education, green infrastructure and health, policy Option I2a is favourable as it caters to the social, environmental and economic objectives. A minor positive impact on SA Objectives 4, 7, 9, 10, 12 and 13 could occur as the policy is focussed on promoting wellbeing and enhancing natural and built assets as a part of the development. The emphasis on improving connectivity and increasing biodiversity in the policy would be likely to have major positive impacts on SA Objectives 3 and 11. The identified overarching principles would help to reduce South Warwickshire’s contribution towards the causes of climate change, therefore a minor positive impact on SA Objective 1 could also be observed.

E.2.2.2 Pursuing policy Option I2b would have similar potential benefits to policy Option I2a, except that the infrastructure related growth strategy would not be set until Part 2 of the plan. Furthermore, the different approaches between the currently adopted Local Plan and Core Strategy policies for the two districts could cause inconsistency in infrastructure provision, thus potentially making it a less favourable policy option.

E.2.3 Issue I3: Community Infrastructure Levy (CIL)

Option I3a	Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy.
Option I3b	Each District Council to produce its own Levy Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances.

Policy Option	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
I3a	+	+	+	0	0	+	0	+	0	+	+	+	+
I3b	+	+	+	0	0	+	0	+	0	+	+	+	+

E.2.3.1 Policy Option I3a recommends establishing a South Warwickshire Community Infrastructure Levy (CIL) to support the delivery of the SWLP. CILs are intended to fund infrastructure requirements alongside new development, concerning sustainability topics such as health and wellbeing, education, social and community facilities, flood management, biodiversity, and transport. The policy could help to ensure that site end users are served by suitable infrastructure and are located in areas with good access to essential services and facilities. Therefore, minor positive impacts relating to several SA Objectives could be expected (SA Objectives 3, 6, 8, 10, 11, 12 and 13).

E.2.3.2 Informed by an Infrastructure Delivery Strategy, the CIL could also help to review and improve the climate resilience of existing and new infrastructure, with potential to result in a minor positive impact on climate change and flooding (SA Objectives 1 and 2).

E.2.3.3 Unlike Option I3a, policy Option I3b would require each district council to produce its own levy. The policy option would have similar impact on SA Objectives to Option I3a, but could potentially be more favourable due to the localised approach to different conditions in the different areas of the SWLP region.

E.2.4 Issue I4: Infrastructure Safeguarding

E.2.4.1 This policy has the potential to contribute towards delivery and safeguarding of infrastructure schemes, such as transport improvements. If specific reasonable alternatives are identified through the plan making process, these can be evaluated in the SA.

E.2.5 Issue I5: Viability and Deliverability

E.2.5.1 This issue invites comments relating to infrastructure, viability and deliverability of development, but does not provide any questions or options. If specific policy options are identified relating to viability and deliverability, these can be evaluated in the SA.

E.2.6 Issue S1: Green and Blue Corridors

Option S1a	Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced Utilising Information from the soon to be updated, Sub-Regional Green Infrastructure Strategy and additional evidence obtained in consultation with Green Infrastructure Stakeholders, should the South Warwickshire Local Plan identify Green Infrastructure corridors which can be used to help determine the growth strategy.
Option S1b	Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy Instead of identifying Green and Blue Corridors within the South Warwickshire Local Plan, this option will rely on the production of the Local Nature Recovery Strategy. The production of a Local Nature Recovery Strategy will likely come after the SWLP Spatial Growth Strategy has been determined, therefore it is likely that there will be a reduced synergy.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
S1a	++	++	++	++	+	+	++	0	0	+	+	0	0
S1b	+	+	++	++	0	0	++	0	0	+	0	0	0

E.2.6.1 Considering that South Warwickshire aspires for biodiversity and environmental resilience, policy Option S1a performs well in sustainability terms, as it favours identification of strategic and multi-functional green and blue infrastructure corridors, informed by the existing Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy and the emerging update. The consideration of green and blue corridors in the SWLP would be expected to have direct and major positive impacts in terms of climate change and flood risk mitigation, enhancement of biodiversity and the local landscape, and conservation of natural resources (SA Objectives 1, 2, 3, 4 and 7) as the policy would determine the growth strategy alongside these corridors. The benefits would also extend a minor positive impact in relation to SA Objective 5 as the growth strategy may integrate culture heritage features such as ancient woodland and historic landscapes, helping to retain the region's rural character. Furthermore, the green and blue corridors could also encourage active travel, reduce reliance on vehicles, improve air quality and health and wellbeing of people living, visiting or working in the plan area (SA Objectives 6, 10 and 11).

E.2.6.2 Policy Option S1b recommends producing Local Nature Recovery Strategy without identifying green and blue corridors in the SWLP. The policy option will certainly result in benefits in terms of preservation of the region's biodiversity, enhancing the local landscape and conservation of natural resources (SA Objectives 3, 4 and 7 respectively), although these positive effects may emerge in the longer term, compared to Option S1a. It is expected that Option S1b would also extend a minor and indirect positive impact on the health and wellbeing of people living, visiting or working in the plan area (SA Objective 10). As compared to policy Option S1a, climate change and flood risk mitigation benefits (SA Objective 1 and 2) would be lower due to reduced synergy.

E.2.6.3 Overall, Option S1a is likely to be the better performing of the two options, as it would prioritise identification of multi-functional green and blue infrastructure corridors at the

earliest opportunity, which can then be used to inform the most appropriate locations for development and growth alongside these corridors. This may also be a starting point to help inform and develop the Local Nature Recovery Strategy.

E.2.7 Issue S2: Intensification

Option S2a	<p>Identify areas considered particularly suited to intensification development, and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.</p> <p>Considering whether an area is particularly suited to intensification is likely to take into account a number of factors. These could include proximity to services (for example, streets within half a mile of a town centre or train station); and the existing built form and character of an area. Identifying areas in this way is likely to encourage intensification developments to take place, and a design code would ensure that such developments make a positive contribution to the neighbourhood.</p>
Option S2b	<p>Have a policy with 'in principle' support for intensification development, applicable across South Warwickshire; and develop design codes</p> <p>In this option, the policy would apply across the whole of the South Warwickshire area. Design codes could still be drawn up for individual character areas, but it would also be prudent to have a more generic intensification design code that applied everywhere else. It may be difficult for this more generic design code to direct the most appropriate forms of intensification across a wide range of localities and architectural styles.</p>
Option S2c	<p>Do not have a policy which encourages intensification</p> <p>This option is likely to mean that fewer intensification schemes come forward, so some land in sustainable locations would remain under-utilised, and resulting in a greater requirement for housing developments on greenfield land. Without a design code, applicants may find it harder to know what would be acceptable in planning terms, and the quality of intensification schemes coming forward may be lower.</p>

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
S2a	+	+	+	++	++	0	++	0	++	++	++	+	+
S2b	+	+	+	+	+	0	+	0	+	+	+	+	+
S2c	0	0	0	-	-	0	0	0	0	0	0	0	0

E.2.7.1 Policy Option S2a favours identification of areas suitable for intensification and developing a design code for each character area. As the policy favours intensification dependent on suitability, such as proximity to services, it is likely to be beneficial for the region's infrastructure aspects pertaining to provision of homes and promoting wellbeing, connectivity and accessibility, hence a major positive impact on SA Objectives 9, 10 and 11 can be observed. The benefits of intensification could also extend to accessibility to schools and jobs, with a minor positive impact identified for SA Objectives 12 and 13. Although, it should be noted that intensifying development could also have implications for the capacity of services and facilities in these areas.

E.2.7.2 Under Option S2a, the proposed design codes would be expected to cover the region's distinctiveness, build upon its unique character and ensure preservation of its natural resources by promoting more efficient use of land; thus, it is likely that the policy will cater to SA Objectives 4, 5 and 7 in a positive manner. Considering the environmental sustainability and climate change aspects of developing design codes, such as

incorporation of green infrastructure, potential positive impacts on SA Objective 1, 2 and 3 can also be assumed.

E.2.7.3 Policy Option S2b recommends ‘in principle’ support for intensification design codes across South Warwickshire. The policy option is more generic as opposed to Option S2a which is more localised, meaning that the design and development under S2b may not respond to specific local factors. Therefore, the positive impact on the SA Objectives would comparatively be less than pursuing policy Option S2a.

E.2.7.4 Not having a policy as suggested in Option S2c is not favourable for South Warwickshire considering that the region aspires for long term sustainability. Pursuing this option would mean that South Warwickshire would miss out on opportunities to utilise sustainable locations and developments may be more dispersed and require more development on greenfield sites as a result. A minor negative impact on natural resources would therefore be expected (SA Objective 7). Due to the lack of design codes to inform development, potential negative impacts on SA Objectives 4 and 5 could also occur.

E.2.8 Issue S3: Using Brownfield Land for Development

E.2.8.1 Question S3.1 invites comments relating to the Urban Capacity Study. There are no policy options for assessment.

E.2.8.2 Question S3.2 presents three options relating to the use of brownfield land for development, which have been evaluated below.

<p>Option S3.2a</p>	<p>Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area. Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances, brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development.</p>
<p>Option S3.2b</p>	<p>Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location This option looks to prioritise the redevelopment of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.</p>
<p>Option S3.2c</p>	<p>None of these</p>

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
S3.2a	+	+	+	++	+	0	++	+	+	0	++	0	+
S3.2b	+	+	+	+/-	+/-	0	++	+	+	0	+	0	+
S3.2c	-	0	0	-	-	-	-	-	0	0	-	0	-

E.2.8.3 Paragraph 119 of the NPPF states “*planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*”. As such, the use of previously developed sites for development should be supported and encouraged by local authorities, as it is an efficient use of land.

E.2.8.4 In alignment with the SWLP’s objective for effective use of land and to reduce the need for development on previously undeveloped greenfield sites, policy Option S3.2a prioritises brownfield development in sustainable locations only, in correspondence with the growth strategy. Therefore, a major positive impact on SA Objective 4, 7 and 11 would occur as the region’s landscape would be retained and natural soil resources would be protected along with reduced need to travel and dependence on vehicles. As more of the development needs would be met in existing urban areas and sustainable locations, with consequently less need for greenfield development, the policy option could yield benefits in terms of carbon sequestration, flood risk attenuation, preservation of habitats and biodiversity, preservation of the rural character and cultural heritage, reduction in construction waste and regeneration in the SWLP region, hence a minor positive impact on SA Objective 1, 2, 3, 5, 8 and 13 could be achieved. An effective use of land including higher density development in centres would also ensure more houses are provided across the plan area and as a result, a minor positive impact on SA Objective 9 is also likely.

E.2.8.5 Policy Option S3.2b prioritises development on brownfield land, irrespective of whether the location of development is considered sustainable, therefore making it uncertain to determine how the landscape (SA Objective 4) and cultural heritage (SA Objective 5) would be impacted as this option could lead to brownfield sites in more rural and potentially more sensitive locations being developed. The potential benefits in terms of carbon sequestration, flood risk attenuation, preservation of habitats and biodiversity, reduction in construction waste and regeneration in the SWLP region would be likely to remain the same as Option S3.2a (SA Objective 1, 2, 3, 8 and 13). The policy option will have major positive impact on SA Objective 7 and minor positive impact on SA Objective 9 as the brownfield development would ensure efficient use of land, densification and protection of soil resources. A positive impact would be expected overall with regard to transport (SA Objective 11), as the majority of brownfield sites are likely to be within urban areas under either Option S3.2a or S3.2b, although Option S3.2b may also result in some isolated brownfield sites being developed.

E.2.8.6 Brownfield development is a key component of sustainable development and the lack of policy as suggested in Option S3.2c could be detrimental for several SA Objectives. The region could lose opportunities of carbon sequestration, preservation of the natural landscape and rural heritage, efficient use of land and protection of soil resources, reduction in construction waste and regeneration in the SWLP region, hence a potential minor negative impact on SA Objective 1, 4, 5, 7, 8 and 13 could occur. The absence of policy would also result in minimised opportunities to reduce travel time and may cause further pollution due to increased emissions, hence a minor negative impact on SA Objective 6 and 11 could be observed.

E.2.9 Issue S4: Growth of existing settlements

E.2.9.1 The evaluation of options for growth within existing settlements in the SA consists of an assessment of 32 broad locations at main settlements (see Chapter 4) and assessment of 22 small settlement locations (see Chapter 5).

E.2.10 Issue S5: The potential for new settlements

E.2.10.1 The evaluation of new settlement locations is presented in Chapter 6 of the Regulation 18 SA Report.

E.2.11 Issue S6: A review of Green Belt boundaries

E.2.11.1 This Issues and Options version of the SWLP has been prepared without consideration of effects on the Green Belt. No policy options or questions are presented relating to Green Belt at this stage, but it is expected that a Green Belt Study will be carried out in the future to inform the plan making process by helping to identify any suitable locations for alteration of the Green Belt boundaries. If specific reasonable alternatives are identified relating to Green Belt, these can be evaluated in the SA.

E.2.12 Issue S7: Refined Spatial Growth Options

E.2.12.1 The evaluation of spatial growth options is presented in Chapter 7 of the Regulation 18 SA Report.

E.2.13 Issue S8: Small scale development outside of the chosen spatial growth option

E.2.13.1 Issue S8 poses questions relating to the potential to allow more small-scale development to come forward within or adjacent to existing settlements, up to specific thresholds. If specific reasonable alternatives are identified through the plan making process, these can be evaluated in the SA.

E.2.14 Issue S9: Settlement Boundaries and infill development

Option S9a	<p>Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.</p> <p>Any revisions to existing boundaries, and consideration of which settlements have boundaries, would be saved for Part 2 plans and NDPs. The advantage of this approach is that waiting until Part 2 is likely to mean more detailed information is available – for example non-strategic allocations will likely not be made until Part 2, so waiting for these to come forward means any boundary revisions can accurately reflect new allocations. The disadvantages are that inconsistencies of approach between Stratford-on-Avon and Warwick Districts would not be addressed in the short term; and it results in a longer time period to address any out-of-date boundaries.</p>
Option S9b	<p>Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.</p> <p>The aim would be to achieve a consistent approach across Stratford-on-Avon and Warwick Districts regarding the type or size of settlement that has a defined boundary. The main impact is on where limited infill development is permitted, and where ‘open countryside’ policies apply. The disadvantage is that some non-strategic land allocations will likely not be made until Part 2 plans come forward. In such cases, it becomes difficult to make appropriate revisions to boundaries in advance of these non-strategic allocations.</p>

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
S9a	+	0	+	+	+	+	0	0	+	0	+	0	0
S9b	+	0	+	+	+	+	0	0	+	0	+	0	0

E.2.14.1 Option S9a recommends saving the existing settlement boundaries and revise them within the Part 2 Plan and NDPs. The detailed planning will be carried ahead in the subsequent stages. The updated boundaries and the subsequent compendium of existing assets would act as a benchmark to set out new development strategies based on need; hence this approach is likely to be beneficial for infrastructural aspects like housing and transportation (SA Objectives 9 and 11). The benefits would also be extended to retaining South Warwickshire’s biodiversity and geodiversity, authentic landscape and cultural heritage (SA Objectives 3, 4 and 5 respectively) by ensuring that an up-to-date assessment is made to distinguish between settlements and the surrounding countryside. Furthermore, it is assumed that the review will potentially take climate change and pollution aspects into consideration for the new development strategy, such as through allowing more infill development and promoting compact, well-serviced settlements (SA Objectives 1 and 6).

E.2.14.2 Pursuing Option S9b involves reviewing existing settlement boundaries within Part 1 of the Plan, which could be beneficial to address South Warwickshire’s objectives for the new growth strategy up to 2050 by incorporating locationally specific information at the earliest possible stage. The policy would ensure consistency across the two districts and just as for Option S9a, the impact of the policy on the SA Objectives would be likely to remain the same, except that the timings of executing the settlement boundaries would vary.

E.3 Delivering South Warwickshire’s Economic Needs

E.3.1 Issue E1: Growing the South Warwickshire’s economy

E.3.1.1 See Chapter 9 for assessment of the identified employment number option.

E.3.2 Issue E2: A Low Carbon Economy

Option E2a	Include a policy which encourages businesses to be low carbon. This could be in terms of their use of materials, promotion of active travel initiatives for employees and the use of clean technologies in construction and in infrastructure delivery, their buildings, transport arrangements, supporting development of clean technology clusters close to innovation areas and identifying sites suitable for material reuse hubs to support a circular economy. The policy could also include prioritisation for businesses looking to use low carbon infrastructure such as renewable energy. This would be a new policy in response to the need to address climate change as neither Core Strategy or Local Plan currently has a specific policy on this.
Option E2b	Do not include a policy encouraging businesses to be low carbon. It is acknowledged that it could be difficult and costly for some businesses to become greener especially if it involves retrofitting. As there is still a strong emphasis on maintaining a thriving economy, it is important not to discourage businesses to the area.
Option E2c	Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy. This would help to brand South Warwickshire as a place where green businesses may wish to locate to. It would be a new policy in response to the need to address climate change.

Policy Option	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E2a	++	0	0	0	0	++	0	0	0	+	+	0	++
E2b	0	0	0	0	0	0	0	0	0	0	0	0	+
E2c	-	0	0	0	0	-	0	0	0	0	0	0	++

E.3.2.1 Option E2a encompasses strategies that would encourage businesses to address climate change. Encouraging low carbon business practices will also favour the economy as it would be likely to attract a growing number of climate-conscious people and businesses, and support development and investments in clean technology clusters and innovation centres. Therefore, a major impact on the green economy could be achieved (SA Objective 13). The use of clean technologies will be beneficial for the environment in terms of reducing emissions, resulting in a potentially major positive effect on SA Objectives 1 and 6. The support for active travel will also result in a minor positive impact on health and accessibility (SA Objectives 10 and 11).

E.3.2.2 As suggested in Option E2b, not having policies that would encourage businesses to be low carbon may not be as favourable for the economy compared to having them to deliver South Warwickshire’s economic needs, thus a minor positive effect is identified for SA Objective 13.

E.3.2.3 Although Option E2c favours South Warwickshire’s economic prosperity and growth, the new development and increase in economic activity, irrespective of whether they are green businesses, would result in an increased carbon footprint and hence more emissions and pollution with potential for a minor negative effect (SA Objectives 1 and 6).

E.3.2.4 A combination of Options E2a and E2c is recommended as pursuing this strategy would address retrofitting existing businesses and also attracting new green businesses to the region. The combined policy will cater to achieving the overall objectives of green economy.

E.3.3 Issue E3: Diversifying the economy

Option E3a	Include a policy expanding on SDC’s current existing policy. This sets out the principles for economic activity within South Warwickshire and would also include setting out how much employment provision would need to be provided.
Option E3b	Have separate policies for individual sectors. These would set out criteria for economic activity including how much employment provision should be provided for each sector and may need to be adapted depending on whether the area is urban or rural.
Option E3c	Include a policy that secures employment strategies through S106. This would look at a strategy which would indicate how developers would promote employment and skills at certain stages of the development process for local people. For example, it could be a percentage of jobs are advertised to local people only. It would help to retain local skills and provide jobs for local people.
Option E3d	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E2a	+	0	0	0	0	+	0	0	0	0	+	0	++
E2b	0	0	0	+	+	0	0	0	0	0	0	0	++
E2c	0	0	0	0	0	0	0	0	0	0	0	+	+
E2d	0	0	0	0	0	0	0	0	0	0	0	0	0

E.3.3.1 Option E3a would be favourable for the economy to support varying income streams and mixed employment opportunities in South Warwickshire. SDC’s existing policies emphasise on sustainable locations for setting out economic activities. Hence, pursuing this strategy would not only result in a major benefit to the employment provisions (SA Objective 13), but a minor positive impact would also extend to climate change, pollution and transportation aspects (SA Objectives 1, 6 and 11).

E.3.3.2 As suggested in Option E3b, having sector-wide defined policies could be beneficial in terms of having targeted strategies for employment provisions. Giving the rural/ urban character its due place in the policy considerations would also help retain the local landscape and cultural heritage of the region (SA Objective 4 and 5).

E.3.3.3 Policy Option E3c emphasises only on promoting employment and skills for a definite set of demographics, which may not be as favourable compared to other options, with a minor positive effect identified for SA Objectives 12 and 13. An optimised combination of all the

three policies is recommended to achieve the objectives of diversifying the local economy, rather than having no policies as recommended in Option E3d.

E.3.4 Issue E4: Sustaining a rural economy

Option E4.1a	Include a policy supporting diversification. This would set out criteria of how rural businesses and agricultural diversification will be supported. The policy could expand one existing policies and be a combination of what is currently in Stratford's Core Strategy and Warwick's Local Plan.
Option E4.1b	Do not include a specific policy on diversification. This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E4.1a	-	0	0	-	-	-	0	0	0	0	+	+	++
E4.1b	0	0	0	0	0	0	0	0	0	0	+/-	+/-	+

E.3.4.1 Pursuing Option E4.1a to support the rural economy through introducing a diversification policy would favour South Warwickshire' economy, with potential to result in a major positive impact on SA Objective 13. The combined policy option from both Stratford's Core Strategy and Warwick's Local Plan would result in extended support for not just varying income streams, but also for skill development (SA Objective 12) and improved transportation in the region (SA Objective 11). The policy implications would also potentially result in minor negative impact on the existing landscape and alteration of the rural and historic character (SA Objectives 4 and 5). Furthermore, the increased economic activity would be likely to adversely impact climate change and pollution aspects to some extent, with the increase in footprint and resulting emissions (SA Objectives 1 and 6).

E.3.4.2 Not having a specific policy to encourage rural diversification (Option E4.1b) could help to retain South Warwickshire's rural character to a greater extent than Option E4.1a, but may not be as favourable for the economy (SA Objective 13). Furthermore, not having a targeted policy makes it difficult to determine the impact on how the region would pursue its objective to improve transportation needs and address the skill development and training aspects for employment provisions, thus uncertain impacts identified under SA Objectives 11 and 12.

Option E4.2a	Include a policy supporting small-scale employment opportunities in rural areas This would encourage small businesses to be to grow in more rural areas of South Warwickshire which in turn would help to contribute and sustain the local economy.
Option E4.2b	Do not include a policy supporting small-scale employment opportunities in rural areas This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E4.2a	-	0	0	-	-	-	0	0	0	0	+	+	++
E4.2b	0	0	0	0	0	0	0	0	0	0	+/-	+/-	+

E.3.4.3 Pursuing Option E4.2a to support small-scale employment opportunities in rural areas would favour South Warwickshire’ economy, with potential to result in a major positive impact on SA Objective 13. The encouragement to support and sustain the local economy would result in extended support for not just varying income streams, but also for skill development (SA Objective 12) and may help to reduce travel time in the region by encouraging more dispersed smaller-scale job opportunities (SA Objective 11). The policy implications would also potentially result in a minor negative impact on the existing landscape through alteration of the rural and historic character (SA Objectives 4 and 5). Furthermore, the increased economic activity would be likely to impact climate change and pollution aspects to some extent, with the increase in footprint and the resulting emissions (SA Objectives 1 and 6).

E.3.4.4 Not having a specific policy (Option E4.2b) could help to retain South Warwickshire’s rural character to a greater extent than Option E4.2a, but may not be as favourable for the economy (SA Objective 13). Furthermore, not having a targeted policy makes it difficult to determine the impact on how the region would pursue its objective to improve transportation needs and address the skill development and training aspects for employment provisions, thus uncertain impacts identified under SA Objectives 11 and 12.

E.3.5 Issue E5: Lack of business accommodation

Option E5a	Include a policy which supports a range of business units. This policy would encourage business units of differing sizes including smaller units for those businesses looking to start up. It is often difficult for small businesses to find affordable and available premises. This would be a new approach as currently there aren’t any specific existing policies in relation to this in either the Core Strategy or Local Plan.
Option E5b	Do not include a policy in Part 1. This level of detail may be considered beyond the scope of the Part 1 plan. Existing detailed policies may be ‘saved’ and subsequently incorporated into a Part 2 plan and/or other policy documents as appropriate.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E5a	-	0	0	0	0	-	0	+/-	0	0	+/-	0	++
E5b	0	0	0	0	0	0	0	0	0	0	0	0	+/-

- E.3.5.1 Addressing the lack of a policy in the currently adopted plan, having Option E5a would be crucial for existing businesses as they will be supported in terms of availability of appropriate premises with reference to their business sizes. This may help to support a more diverse supply of employment sites, hence a major benefit to the region’s economy (SA Objective 13).
- E.3.5.2 Depending on whether the businesses and their operations relocate, this could impact the existing infrastructure, making it uncertain to determine the potential impact on waste disposal and transportation aspects (SA Objectives 8 and 11). Moreover, new businesses and office spaces would be likely to result in increased carbon emissions and environmental footprint to some extent, hence potential to adversely impact climate change and cause more pollution (SA Objectives 1 and 6).
- E.3.5.3 Having no policies for small business accommodations as mentioned in Option E5b causes uncertainty in impact assessment of the region’s economy (SA Objective 13), as compared to having a policy.

E.3.6 Issue E6: Protecting South Warwickshire’s economic assets

Option E6a	Include a policy which protects South Warwickshire’s economic assets. As these assets are a major contributor to the economy, it may be appropriate to protect their current use to support them and ensure that the right investment is made in these areas. However, such a policy might hinder alternative uses if the current needs change.
Option E6b	Do not include a policy protecting all these economic assets. This could mean that there would be a loss to the economy if some of these assets are not protected and are lost to other uses. It may be that some of these assets would be covered under alternative policies, or the view may be taken that specific protection is not needed. Alternatively, protecting these assets could be seen as beyond the scope of part one of the plan, and instead be considered in part two of the Plan.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E6a	0	0	0	++	++	0	0	0	0	0	0	0	+
E6b	0	0	0	-	-	0	0	0	0	0	0	0	-

- E.3.6.1 South Warwickshire supports a range of economic assets. The Issues and Options document lists several aspects of the plan area’s physical and built infrastructure that this issue focuses on, including various industries, tourist attractions, historic assets and environmental features such as the Cotswolds AONB (National Landscape).
- E.3.6.2 A dedicated policy focussing on these assets, such as Option E6a, would be favourable for not just retaining the authentic landscape and the cultural heritage of the region (SA Objectives 4 and 5) which are unique to South Warwickshire, but would also contribute significantly to the economy and focus on targeted areas of investments (SA Objective 13).
- E.3.6.3 Although national policies provide legal protection to designated heritage assets, such as listed buildings, the lack of dedicated policy for South Warwickshire as suggested in Option E6b could pose major challenges to the region’s economy (SA Objective 13) that could

otherwise be capitalised through these assets. Furthermore, the region could potentially lose these assets such as its authentic landscape and rural character if there are no policies that would provide guidance to retain them, hence a minor negative impact on SA Objectives 4 and 5 could occur.

E.3.7 Issue E7: Core Opportunity Area and Major Investment Sites

Option E7.1a	Include a policy directing employment to the Core Opportunity Area. This policy would look to direct employment growth to the Core Opportunity Area with areas outside of this, providing opportunities for more local investment.
Option E7.1b	Do not include a policy directing employment to the Core Opportunity Area. This could mean that South Warwickshire fails to capitalise on employment opportunities or that new investment is focused outside of the Core Opportunity Area and fails to capitalise on the connectivity that the core opportunity area brings.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E7.1a	-	0	0	-	0	-	0	-	0	0	-	+	++
E7.1b	0	0	0	0	0	0	0	0	0	0	0	0	--

E.3.7.1 Pursuing Option E7.1a in South Warwickshire could result in a major positive impact on the region’s economy (SA Objective 13) as the policy seeks to encourage employment growth and further investment within the Core Opportunity Area (as defined in the Issues and Options document, this comprises the five main towns, the A46 Trans Midlands Trade Corridor and the central section of the M40). The positives of addressing opportunities for local investments could potentially extend to skill development and training provisions in the region (SA Objective 12). However, the increased employment growth related activities could result in increased stress on existing infrastructure, potentially leading to a minor negative impact on especially waste disposal and transportation aspects (SA Objectives 8 and 11). Moreover, new economic activities would be likely to result in increased carbon emissions and environmental footprint to some extent, hence potential to adversely impact climate change and cause more pollution (SA Objectives 1 and 6). Increased growth throughout the Core Opportunity Area could also result in a minor adverse effect on the landscape, particularly if growth extends outside of the main towns (SA Objective 4).

E.3.7.2 As suggested in Option E7.2b, having no policies that cater to employment opportunities in the Core Opportunity Area would negatively impact South Warwickshire’s objectives for economic growth of the region (SA Objective 13), losing opportunities for inward investment.

Option E7.2a	Include a policy relating to additional economic growth at the major investment sites. This policy would seek to allocate additional land for specific employment uses at the major sites, including a list of development principles in order to create the right environment to secure major inward investment into South Warwickshire.
Option E7.2b	Do not include a policy relating to additional economic growth at the major investment sites. This could mean that South Warwickshire fails to capitalise on employment opportunities. It could also undermine the presence of existing businesses as they find themselves unable to grow in the long-term. This could put existing jobs at risk.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E7.2a	-	0	0	-	0	-	0	0	0	0	0	+	++
E7.2b	0	0	0	0	0	0	0	0	0	0	0	0	-

E.3.7.3 Option E7.2a recommends a policy which seeks to encourage additional economic growth at major investment sites, hence would result in major positive impact on the region’s economy (SA Objective 13). Growth at Major Investment Sites could also result in a minor positive impact on education (SA Objective 12), through improving training opportunities and education such as at the University of Warwick. But, expanding economic growth to additional land could potentially adversely impact the region’s landscape (SA Objective 4) and could pose minor negative impact in terms of increased carbon emissions and environmental footprint, thus impacting climate change and causing more pollution (SA Objectives 1 and 6).

E.3.7.4 As suggested in Option E7.2b, having no policies related to additional economic growth at the major investment sites would be likely to negatively impact South Warwickshire’s objectives for economic growth (SA Objectives 13).

E.3.8 Issue E8: Existing Employment Sites

E.3.8.1 This issue sets out the Councils’ intention to review and update the existing employment allocation at Atherstone Airfield to ensure changing circumstances are taken into account, and poses questions relating to marketing, viability and alternative use tests to ensure the strategy is appropriate. If specific policy options and/or reasonable alternative employment sites are identified through the plan making process, these can be evaluated in the SA.

E.3.9 Issue E9: Supporting our changing town centres

Option E9a	Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan. In order for the hierarchical approach to be implemented effectively it may be useful to identify retail areas within each of the Town Centres as well as Town Centre boundaries. This would follow the current Warwick District Local Plan approach whereas currently Stratford does not currently identify these. It would allow consistency across South Warwickshire.
Option E9b	Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2. This may not be considered a strategic matter for Part 1 to address. However, saving existing boundaries would result in an inconsistent approach across the two Districts.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
E9a	0	0	0	0	0	0	0	0	0	0	0	0	++
E9b	0	0	0	0	0	0	0	0	0	0	0	0	+

E.3.9.1 Addressing SWLP’s objective to support changing town centres, the policy Option E9a recommends identification of retail areas on the policies map and defining Town Centre boundaries. This would result in a major positive impact on the region’s economy (SA Objective 13) as the policy option would be useful to implement the hierarchical approach and ensure consistency across South Warwickshire. Option E9a would be likely to ensure that different retail and commercial provisions are directed to appropriate areas to meet the needs of the local area.

E.3.9.2 Policy Option E9b favours addressing town centre and retail area boundaries in Part 2 of the plan and retain the existing approach in Part 1 Plan, which currently only applies to Warwick District. Due to the inconsistent approach across the two districts, the positive impact on SA Objective 13 would be reduced compared to pursuing policy Option E9a.

E.3.10 Issue E10: Tourism

E.3.10.1 This issue regards tourism and how it should be addressed through the SWLP, acknowledging that tourism forms an important aspect of South Warwickshire’s economy but does not identify policy options. If specific policy options are identified through the plan making process regarding tourism, these can be evaluated in the SA.

E.4 Delivering homes that meet the needs of all our communities

E.4.1 Issue H1: Providing the right number of new homes

E.4.1.1 See Chapter 9 for assessment of reasonable alternative housing number options.

E.4.2 Issue H2: Providing the right tenure and type of homes

Option H2.2a	A single South Warwickshire wide affordable housing requirement
Option H2.2b	Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts
Option H2.2c	A more localised approach with separate affordable housing requirements for different localities across South Warwickshire

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
H2.2a	+	0	0	0	0	+	0	0	+	+	+	0	+
H2.2b	+	0	0	0	0	+	0	0	+	+	+	0	+
H2.2c	+	0	0	0	0	+	0	0	+	+	+	0	+

E.4.2.1 Addressing the issues of housing affordability in South Warwickshire, policy Option H2.2a proposes a single affordable housing requirement across the SWLP region, thus ensuring a minor positive impact on SA Objective 9. The availability of affordable housing would also translate into improved wellbeing (SA Objective 10), and could potentially help to ensure reduced travel times through closer proximity to workplaces and employment sites for people living, visiting or working in the plan area (SA Objectives 11 and 13). The reduced travel time and dependence on vehicles would potentially benefit the air quality and help mitigate climate change impacts in the long run (SA Objective 1 and 6).

E.4.2.2 Policy Option H2.2b would potentially have the same impact as Option H2.2a on SA Objectives except that the separate policy for each district would help cater to the affordable housing requirements in a more efficient way.

E.4.2.3 Policy Option H2.2c could be considered the most favourable for the SWLP as the option suggests a more localised approach with varying affordable housing numbers across South Warwickshire, which may help to ensure that the needs of each local area can be met. The potential impact on the rest of the SA Objectives would remain same.

E.4.3 Issue H3: Providing the right size of homes

Option H3a	H5a: Do not seek to include minimum space standards in a policy in the SWLP. It may not be considered strategically important, across the entirety of South Warwickshire. In this case, minimum space standards could be considered in a Part 2 plan.
Option H3b	Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence. This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.
Option H3c	Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards. This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.
Option H3d	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
H3a	0	0	0	0	0	0	0	0	+/-	+/-	+/-	0	0
H3b	0	0	0	0	0	0	0	0	++	+	0	0	0
H3c	0	0	0	0	0	0	0	0	+	+	+	0	0
H3d	0	0	0	0	0	0	0	0	-	0	0	0	0

E.4.3.1 Option H3a suggests not having any minimum space standard in Part 1 of the Local Plan. Moreover, evidence of need for locally derived space standards has not been gathered, thus making it uncertain to determine the policy’s impact on the region’s housing, health and transportation aspects at this stage (SA Objectives 9, 10 and 11 respectively).

E.4.3.2 As suggested in Option H3b, applying Nationally Described Space Standards to housing development in South Warwickshire would result in major positive impact on the region’s housing i.e. SA Objective 9. Furthermore, since the policy would be based on locally derived evidence, the positive impact could also extend to the wellbeing of the people living, visiting or working in the plan area by catering to the specific housing needs of the (SA Objective 10) while addressing the issue of housing space standards.

E.4.3.3 Option H3c suggests meeting the requirements of Building Regulations M4(2)/M4(3) as standard in order to ensure appropriate accessibility within the region, thus potentially resulting in a minor positive impact on transport and accessibility (SA Objective 11) and the wellbeing of the people living, visiting or working in the plan area with specialist needs (SA Objective 10). The policy option does not take the locally derived evidence into account to address space standards, hence it is a less favourable option as compared to Option H3b, with a minor positive impact identified regarding SA Objective 9.

E.4.3.4 As suggested in Option H3d, not having a policy that would address the issue of housing space standards in South Warwickshire could potentially result in a minor negative impact on SA Objective 9.

E.4.4 Issue H4: Accommodating housing needs arising from outside of South Warwickshire

E.4.4.1 This policy has the potential to contribute towards meeting unmet housing needs arising from neighbouring local authorities, in accordance with the NPPF. If specific policy options are identified through the plan making process regarding the approach to meeting other authorities' housing needs, these can be evaluated in the SA.

E.4.5 Issue H5: Providing custom and self-build housing plots

Option H5a	Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes. This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not be appropriate.
Option H5b	Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site. This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. However, some people looking for self and custom build homes may not wish to live or on the edge of a large housing site. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.
Option H5c	Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability. This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for self and custom build homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of self and custom build home are made available.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
H5a	-	0	-	-	-	-	-	0	+	0	0	0	0
H5b	--	0	-	-	-	--	-	0	+	0	0	0	0
H5c	+/-	0	+/-	-	-	+/-	+/-	0	+	0	0	0	0

E.4.5.1 Option H5a recommends identification of certain sites within or on the existing edge of settlements in South Warwickshire to address the need for self and custom-build homes, thus a minor positive impact on the region's housing sector (SA Objective 9) can be observed. The proposed development could negatively impact the biodiversity and geodiversity, the authentic landscape, the rural character and the natural resources in the region to some extent (SA Objectives 3, 4, 5 and 7 respectively). Furthermore, the onset of new housing development and construction of custom homes is likely to increase in ecological footprint and carbon emissions (SA Objectives 1 and 6).

E.4.5.2 Just as for Option H5a, policy Option H5b recommends self and custom-build homes, but these would instead be provided alongside a larger development. Option H5b could help delivery of wider spread of this home type in South Warwickshire, although the policy option notes that it may be less desirable for people wishing to build their own homes if it

is only offered alongside larger residential developments. A minor positive impact could nonetheless be observed for SA Objective 9. Since the housing development would be spread across various locations, this option could lead to minor negative impacts to the region’s biodiversity and geodiversity, authentic landscape, rural character and natural resources (SA Objectives 3, 4, 5 and 7 respectively). The wide-ranging impact such as increased ecological footprint and carbon emissions could potentially be observed as well (SA Objectives 1 and 6).

E.4.5.3 As suggested in H5c, self and custom build housing development will rely on case-by-case approach depending on quantity and suitability of planning applications, hence resulting in a minor positive impact on housing (SA Objective 9). The resulting development may potentially adversely impact the existing landscape and the rural character of the region (SA Objective 4 and 5). Considering that the development will be based on “*a range of criteria to determine their suitability*”, it becomes uncertain to determine the impact on climate change, biodiversity and geodiversity, pollution and natural features (SA Objectives 1, 3, 6 and 7 respectively) of South Warwickshire.

E.4.5.4 A combination of Options H5a and H5c is recommended to cater to South Warwickshire’s objective for providing custom and self-build housing plots and also the case-by-case approach could minimise the impact on SA Objectives 1 and 6 particularly.

E.4.6 Issue H6: Pitches and Plots for gypsies, travellers and travelling showpeople

Option H6a	<p>Identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople homes. This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not likely be appropriate.</p>
Option H6b	<p>Require large developments of, say, over 500 homes to provide a proportion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site. This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. Whilst this option has the potential to build positive relationships between the settled and travelling communities and enable both communities to benefit from sustainable infrastructure that is provided as part of a large development, measures would likely need to be put in place to manage and foster these relationships. This approach may not be suitable for Travelling Showpeople yards which are typically larger in order to accommodate circus and fairground equipment. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.</p>
Option H6c	<p>Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Showpeople homes will be assessed against a range of criteria to determine their suitability. This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for Gypsy and Traveller and Travelling Showpeople homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of these type of homes are made available; in the past this approach by itself has not delivered sufficient new provision to meet the need.</p>

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
H6a	-	0	0	-	0	-	0	-	+	0	0	0	0
H6b	-	0	0	-	0	-	0	-	++	0	0	0	0
H6c	0	0	0	-	0	0	0	-	+	0	0	0	0

- E.4.6.1 Addressing South Warwickshire’s objective for developing a sustainable community, Option H6a is favourable for housing provisions (SA Objective 9) as it seeks to provide a range of pitches / plots for the Gypsies, Travellers and Travelling Showpeople. Since the housing is likely to be spread across various locations under this option, this may negatively impact the region’s authentic landscape to some extent (SA Objective 4), although the option notes that provision of pitches / plots in the open countryside would not be appropriate. New development may also give rise to adverse impacts on climate change, pollution and waste (SA Objectives 1, 6 and 8).
- E.4.6.2 Option H6b also addresses the issue of lack of permanent sites for the Gypsy, Travellers and Travelling Showpeople. The proposed requirement for large developments to provide a portion of housing for these communities would potentially result in a major positive impact on the region’s housing i.e. SA Objective 9, owing to the greater certainty of delivery under this option, as compared to Option H6a. However, the new development would also extend some adverse impacts on the region’s ecological footprint and carbon emissions (SA Objectives 1 and 6). Moreover, the provision of pitches / plots on the edge of large development sites could negatively impact the region’s authentic landscape (SA Objective 4) and increase the waste generation in the region (SA Objective 8) due to new construction activities.
- E.4.6.3 A case-by-case approach, as suggested in Option H6c, may not address the issue of housing provisions as much as in Options H6a and H6b, but a minor positive impact can still be observed for SA Objective 9. Since the proposal takes into account the quantity and suitability of planning applications, the Option may not be as detrimental for the region’s authentic landscape (SA Objective 4) as compared to the other options, although a minor negative impact may still occur. The waste generated would be potentially lower as well (SA Objective 8).
- E.4.6.4 A combination of Option H6a and Option H6c is recommended to address the issue of housing provisions for the Gypsy, Traveller and Travelling Showpeople community in South Warwickshire and also ensure that the region’s authentic landscape is preserved without increasing the waste generation.

E.5 A Climate resilient and Net Zero Carbon South Warwickshire

E.5.1 Issue C1: Solar and wind power

E.5.1.1 Question C1.1 presents three options relating to the identification and allocation of solar and wind energy generation schemes, which have been evaluated below.

E.5.1.2 Question C1.2 invites comments relating to the criteria that should be considered when assessing proposals for large scale renewable energy developments. There are no policy options for assessment identified at this stage. If specific options are identified through the plan making process, these can be evaluated in the SA.

Option C1.1a	Identify and allocate land that is considered suitable for wind or solar energy generation schemes Allocating suitable land would set the groundwork for future renewable energy proposals. The details of any such proposal would be further assessed through planning applications. Allocating land would also help prevent schemes coming forward in less suitable locations.
Option C1.1b	Do not allocate land, but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location. Choosing not to allocate land for renewable energy generation would in effect rule out onshore wind projects, unless land was allocated for this purpose in a Neighbourhood Development Plan. Solar developments are not bound by the same restrictions as onshore wind, so these could still come forward without land having been allocated. This type of policy would show general support but would not identify specific locations. Proposals would therefore be considered on a site-by-site basis at planning application stage rather than a more planned-for approach. The policy could encourage this use on certain grades of agricultural land.
Option C1.1c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C1.1a	++	0	--	--	0	++	0	0	0	+	0	0	0
C1.1b	+	0	-	-	0	+	0	0	0	+	0	0	0
C1.1c	-	0	0	0	0	-	0	0	0	0	0	0	0

E.5.1.3 In order to achieve net zero in South Warwickshire, policy Option C1.1a recommends identification and allocation of suitable land for renewable energy generation, therefore reducing reliance on energy from less sustainable sources, and consequently leading to lower carbon emissions in the region. This would be likely to result in a major positive impact on SA Objective 1, by reducing South Warwickshire's contributions to the causes of climate change and extending a major positive impact on air pollution (SA Objective 6). The resulting improvement in air quality would also extend a minor positive impact in terms of health and well-being of the people living, visiting or working in the plan area (SA Objective 10). Despite identifying suitable sites that would ensure minimum adverse impact, the resultant land allocation and the subsequent wind and solar energy production would also be likely to adversely impact the region's authentic landscape (SA Objective 4)

and could be detrimental for biodiversity such as due to increased bird strikes from wind turbines (SA Objective 3).

E.5.1.4 Unlike Option C1.1a, policy Option C1.1b does not favour allocation of land but rather supports energy generation schemes in principle. Since Option C1.1b is subject to criteria of land suitability, the policy may not be as beneficial for pollution and climate change aspects (SA Objective 1 and 6) for South Warwickshire. SA Objective 10 i.e. health would be impacted positively as the benefits would result in overall well-being of the people living, visiting or working in the plan area to some extent. Even though the proposals would be considered on a site-by-site basis, this would still be expected to negatively impact the region’s biodiversity and geodiversity (SA Objective 3) and the authentic landscape (SA Objective 4), but not as severely as policy Option C1.1a, as the developments would be largely restricted to solar rather than wind power.

E.5.1.5 Not having a policy for solar and wind energy as suggested in Option C1.1c would not be favourable for South Warwickshire’s objective to transition towards net zero. Moreover, continuing with the existing energy generation processes could potentially impact SA Objective 1 and 6 negatively in the long term.

E.5.2 Issue C2: Decentralised energy systems

Option C2a	Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable Decentralised energy schemes are typically only viable for developments of a significant size – for example in the region of 2,500 or more dwellings, or 10 hectares or more of employment land. In order see a benefit from this option, much of the planned growth would need to be concentrated into a smaller number of larger developments.
Option C2b	Have a policy encouraging the consideration of decentralised energy systems Option 2 allows for greater flexibility, but is a weaker policy that may result in opportunities being missed.
Option C2c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C2a	++	0	0	+/-	0	+	+/-	+/-	+/-	+	+	0	0
C2b	+	0	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	0	0	0
C2c	-	0	0	0	0	-	0	0	0	0	0	0	0

E.5.2.1 Pursuing policy Option C2a would be beneficial for South Warwickshire if the region’s planned growth is concentrated into a small number of large-scale and densified developments with decentralised energy systems, thus resulting in a minor positive impact on the region’s pollution, health and transport (SA Objectives 6, 9 and 10 respectively). Considering that the resultant development would be concentrated, and less reliant on national energy schemes that may have issues with energy efficiency and security, this would also be expected to result in major positive impact on SA Objective 1 i.e. climate change. The policy proposal is dependent on South Warwickshire’s growth strategy, thus

making it uncertain to determine the potential impact on the region’s landscape, natural resource, waste and housing (SA Objectives 4, 7, 8 and 9 respectively).

E.5.2.2 Policy Option C2b recommends having a flexibility in the approach for decentralised energy systems, thus making it uncertain to determine the potential impact on several SA Objectives that are directly linked to the policy. Nonetheless, the benefits of the decentralisation of energy systems will certainly extend to SA Objective 1 i.e. climate change and SA Objective 10 i.e. health of the people living, visiting or working in the plan area.

E.5.2.3 Not having a policy for decentralisation of energy systems as suggested in Option C2c would not be favourable for South Warwickshire’s objective to transition towards net-zero. Moreover, continuing with the existing energy systems to supply heat and power could potentially impact SA Objective 1 and 6 negatively in the long run.

E.5.3 Issue C3: Carbon Sequestration

E.5.3.1 This issue sets out questions relating to the potential to develop a carbon offsetting approach for new developments and invites comments relating to renewable energy and carbon sequestration opportunities. Developing policies regarding these topics would be in accordance with SWLP’s aims to combat the climate emergency. If specific policy options are identified through the plan making process relating to these topics, these can be evaluated in the SA.

E.5.4 Issue C4: New Buildings

Option C4.1a	Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time. Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.
Option C4.1b	Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments. This would require all new development to achieve net zero carbon from adoption of the plan, expected in 2025. However, it would be at a cost as the development industry may not be ready to viably deliver this and as a consequence we may see less affordable housing built and maybe fewer other social and community benefit from development to offset the cost of achieving net zero carbon. Viability work would be needed to establish the impact of this approach.
Option C4.1c	Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards. This would require all new development to achieve net zero carbon from a future date and this would be set out in the plan. It could allow time for the development industry to adjust to the higher standards, give time for the cost of achieving these standards to come down, and may mean that we can secure more affordable housing and community benefits from development. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C4.1a	+	0	0	0	0	+	0	0	0	0	0	0	0
C4.1b	++	0	0	0	0	++	0	0	+/-	0	0	0	0
C4.1c	++	0	0	0	0	++	0	0	0	0	0	0	0

E.5.4.1 Policy Option C4.1a recommends adhering to the existing national building regulations, and any subsequent updates that are implemented over time. Being tied to the national standards could be beneficial for South Warwickshire’s objective to achieve net zero through the development of new buildings in line with national targets, and the policy would have potential positive impacts on SA Objective 1 and 6 i.e. climate change and pollution respectively.

E.5.4.2 In alignment with South Warwickshire’s ambition to reduce net carbon emissions, policy Option C4.1b favours setting a local standard which is higher than the national building regulations. Despite the need for viability work to assess whether the delivery industry will be able to deliver, the stringent policy recommendation could certainly be beneficial in terms of reducing carbon emissions and minimising ecological footprint, hence a potential major positive impact could be observed for SA Objectives 1 and 6, if achieved. As noted in the policy option text, this option may lead to further challenges in other aspects such as delivery of affordable homes and other social infrastructure, with an uncertain impact for SA Objective 9.

E.5.4.3 Having a phased approach as suggested in Option C4.1c could be beneficial for South Warwickshire’s objective for new development. The flexibility of the phased approach would provide the development industry with time and encouragement to make adjustments to the set standards, thus extending a major positive impact in terms of reduced carbon emissions, ecological footprint and pollution as there would be a greater likelihood of achieving the objectives under this option despite some uncertainty regarding the timescales of implementation (SA Objectives 1 and 6).

E.5.4.4 A combination of Policy Option C4.1b and Option C4.1c is recommended as South Warwickshire would benefit from locally set and stringent building regulations standard and also achieving net zero objectives in a flexible phased manner.

Option C4.2a	All new development Including for example residential extensions
Option C4.2b	Development over a certain size For example all developments of 1 dwelling or more, or 100+ square metres

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C4.2a	+	0	0	0	0	0	0	0	+/-	0	0	0	0
C4.2b	+	0	0	0	0	0	0	0	+/-	0	0	0	0

E.5.4.5 Options C4.2a and C4.2b relate to the scale at which the requirements set out in C4.1 should apply.

E.5.4.6 Defining net zero carbon strategies for new buildings in SWLP based on the scale of development could be beneficial as it would reduce the region’s contributions towards climate change and ensure adaptation to climate change effects. Both the options would perform same in terms of the impact on SA Objective 1.

E.5.4.7 Both options could potentially deter developers from meeting housing requirements, especially in the case of affordable housing, with an uncertain impact for SA Objective 9. Although, Option C4.2b is more favourable than Option C4.2a as it offers more flexibility by relinquishing certain small developments based on their size and dwelling units.

E.5.5 Issue C5: Existing Buildings

Option C5a	Include a policy that requires net zero carbon requirements for all building proposals that require planning permission – including conversions, changes of use, and householder residential applications Achieving net zero carbon requirements on existing buildings that are converted or change use is a great way to be able to retrofit climate change adaptation and mitigation measures into South Warwickshire’s existing building stock. However, the ability to make changes to existing buildings can be more restrictive and expensive than on new builds and may result in some developments becoming unviable.
Option C5b	Include a policy that encourages the retrofit of climate change measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas A policy that proactively encourages the retrofitting of climate change measures into existing buildings, within certain parameters, can make it easier and provide more certainty for property owners to be able to tackle climate change. In sensitive locations this approach may be more challenging and if taken forward it will be important for solutions to be sought to minimise any adverse impact on local surroundings.
Option C5c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C5a	++	0	0	+	+	+	0	+	0	0	0	0	0
C5b	++	0	0	+/-	+/-	+	0	+	0	0	0	0	0
C5c	-	0	0	0	0	0	0	-	0	0	0	0	0

- E.5.5.1 Policy Option C5a recommends implementing a requirement for net zero carbon for all proposals for conversion or re-purposing of existing building stock, thus extending a major positive impact on SA Objective 1 i.e. climate change. Despite the potentially restrictive and expensive development, benefits would also be likely in terms of reduced pollution (SA Objective 6), and this option may encourage re-use and rejuvenation of dilapidated buildings, with potential to aid the conservation and enhancement of South Warwickshire’s authentic landscape and rural character (SA Objectives 4 and 5). Retrofitting existing buildings could also lead to a reduction in construction of new buildings hence extending a potential positive impact on SA Objective 8 i.e. waste.
- E.5.5.2 Policy Option C5b encourages retrofitting the existing buildings as per climate change measures, thus extending a major positive impact on climate change (SA Objective 1). Furthermore, South Warwickshire will also benefit in terms of reduced pollution and waste generation that could potentially occur from new developments, hence a positive impact on SA Objectives 6 and 7. The policy option also caters to retrofitting even the traditional buildings in historical areas which could be challenging in certain sensitive locations, but equally may present opportunities for enhancement or repair of heritage assets, thus making it uncertain to determine the potential impact on SA Objectives 4 and 5.
- E.5.5.3 Not having a policy for new buildings as suggested in Option C5c would not be favourable for South Warwickshire’s objective to transition towards net zero and would be a missed opportunity to repurpose the existing old buildings. Moreover, continuing without retrofitting the existing buildings could potentially be detrimental for SA Objectives 1 and 8 in the long run.
- E.5.5.4 A combination of both policy Options C5a and C5b is recommended to achieve the objectives of net zero in South Warwickshire. A case-by-case approach that ensures flexibility based on assessing whether an existing building would favour from conversions/change of use or retrofitting to tackle climate change should be taken into consideration.

E.5.6 Issue C6: Whole Life-Cycle carbon emission assessments

Option C6.1a	<p>Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a 'business-as-usual' approach to construction</p> <p>A policy requiring reductions in embodied emissions of 100% would have a significantly positive effect on reducing carbon emissions from new development. There are challenges that would need to be overcome in terms of validating and assessing emissions data to ensure its robustness. There may be implications for the viability of some developments following such a policy and this would need to be tested.</p>
Option C6.1b	<p>Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods.</p> <p>A phased and more flexible approach to embodied carbon emissions would slow down the rate at which South Warwickshire can drive down its carbon emissions and could be more complicated to administer if different types of developments have different requirements. However, the approach would allow more time for the development industry to take account and adapt to these requirements and ensure that development are fully viable so that they can come forward to meet the area's development needs.</p>
Option C6.1c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C6.1a	++	0	0	0	0	++	0	+	0	0	0	0	0
C6.1b	++	0	0	0	0	++	0	+	0	0	0	0	0
C6.1c	--	0	0	0	0	-	0	-	0	0	0	0	0

E.5.6.1 Policy Option C6.1a recommends making it compulsory for all new developments to have a whole lifecycle carbon emissions assessment, thus resulting in a major positive impact on climate change i.e. SA Objective 1. Despite the challenge of viability implications, the policy is likely to be beneficial in terms of reduced pollution and waste generation (SA Objective 6 and 8) which potentially may not be the case for new developments that do not take the findings of lifecycle emissions assessments into account.

E.5.6.2 A phased approach has been recommended in policy Option C6b depending on scale and type of development, which would also be expected to result in a major positive impact for SA Objective 1 (climate change) as it provides flexibility for developments and industries to adapt to the new requirements. Despite the complications in administering different requirements in different developments, Option C6.1b is comparatively a better option because of the tailored approach. The policy would also potentially result in major positive impact on SA Objective 6 and minor positive impact on SA Objective 8 as South Warwickshire will benefit from reduced pollution and waste generated from the new development, particularly during the construction phase.

E.5.6.3 Not having a policy for lifecycle emissions assessment as suggested in Option 6.1c is not beneficial as South Warwickshire strives to achieve net zero along with its development objectives. Continuing with the existing process of new developments without the lifecycle assessments could be detrimental in the long run in terms of climate change aspects (SA Objective 1). This will be followed by potential negative impacts on SA Objectives 6 and 8 as pollution and waste generation from new developments will not be kept in check.

E.5.7 Issue C7: Adapting to higher temperatures

Option C7a	Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures This would include the application of the cooling hierarchy, the use of cool materials and provision of green infrastructure to create cooling.
Option C7b	Do not include a policy that requires new developments and changes to existing buildings to incorporate measure to adapt to higher temperatures Not having a policy requiring developments to adapt to higher temperatures would result in new building stock not being designed to deal with this effect of climate change.
Option C7c	None of these

Policy Option	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C7a	++	0	0	0	0	+	+	0	0	+	0	0	0
C7b	--	0	0	0	0	-	0	0	0	-	0	0	0
C7c	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

E.5.7.1 Policy Option C7a recommends making it compulsory for all new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures, thus resulting in a major positive impact on climate change i.e. SA Objective 1. The policy is likely to be beneficial in terms of reduced pollution (SA Objective 6) which potentially may not be the case for new developments that do not incorporate measures to adapt to higher temperatures. The provision for green infrastructure in the policy option would also extend positive impact on SA Objective 7. The application of a cooling hierarchy would also have a potential positive impact on health and wellbeing of people living, visiting or working in the plan area (SA Objective 10).

E.5.7.2 Not having a policy that would require new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures as suggested in Option C7b is not beneficial as South Warwickshire strives to achieve net zero along with its development objectives. Continuing with the existing process of new developments that are not designed to deal with the effects of climate change could be detrimental in the long run in terms of climate change aspects (SA Objective 1). This will be followed by potential negative impacts on SA Objectives 6 and 8 as energy usage, efficiency and generation of pollution from new developments will not be kept in check, which could also adversely impact health and wellbeing of people living, visiting or working in the plan area.

E.5.7.3 In the absence of a policy (Option C7c) to adapt to higher temperatures makes it uncertain to determine the potential effects on SA Objectives.

E.5.8 Issue C8: Adapting to flood and drought events

Option C8a	Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events This would include SuDS and water efficiency requirements
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Option C8b	Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.
Option C8c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C8a	++	++	0	0	0	0	++	0	0	0	0	0	0
C8b	+	+	0	0	0	0	+	0	0	0	0	0	0
C8c	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

E.5.8.1 In alignment with the SWLP’s objective to address flooding and drought events, policy Option C8a recommends having a policy for SuDS and ensuring water efficiency, thus resulting in a major positive impact on SA Objective 2 and 7. The policy favours climate change resilience as it would require new development and changes to existing buildings to incorporate measures to adapt to flood and drought events, thus a major positive impact on SA Objective 1 could also be observed.

E.5.8.2 Policy Option C8b recommends not to have a policy that would go beyond existing regulations. Pursuing this option would mean being tied to the existing national minimum requirements and as a result, only minor positive impact on SA Objectives 1, 2 and 7 would occur as compared to pursuing policy Option C8a.

E.5.8.3 In the absence of a policy (Option C8c) to adapt to flood and drought events makes it uncertain to determine the potential effects on SA Objectives.

E.5.9 Issue C9: Mitigating Biodiversity Loss

E.5.9.1 Question C9.1 presents three options relating to the incorporation of measures to increase biodiversity, which have been evaluated below.

E.5.9.2 Question C9.2 invites comments relating to climate responsive development design in South Warwickshire but does not identify policy options for assessment. If specific options are identified through the plan making process, these can be evaluated in the SA.

Option C9.1a	Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity This could include a requirement for larger developments to have less than 50% of the wider site (excluding buildings) to consist of paved/hard surfaced areas.
Option C9.1b	Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity Opportunities for biodiversity enhancement may be lost without a policy in the plan requiring biodiversity measures to be incorporated into development.
Option C9.1c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C9.1a	++	++	++	0	0	+	++	0	0	0	0	0	0
C9.1b	-	-	-	0	0	-	-	0	0	0	0	0	0
C9.1c	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

E.5.9.3 Policy Option C9.1a favours including a policy that would make it compulsory for new development and changes to existing buildings to incorporate measures to increase biodiversity, thus a major positive impact on SA Objective 3 could occur. The requirement for large developments to have less than 50% of the site to consist of paved/hard surfaced areas would extend benefits in terms of climate change mitigation, reduced flood risk and enhancement of the natural resources in the plan area. Thus, a major positive impact on SA Objectives 1, 2 and 7 could be observed, along with potential minor positive impact on pollution (SA Objective 6).

E.5.9.4 As suggested in policy Option C9.1b, not having a policy to incorporate measures to increase biodiversity would not be favourable for South Warwickshire as the region aspires to mitigate biodiversity loss. The SWLP region would lose the opportunity to enhance biodiversity, beyond national minimum biodiversity net gain requirements implemented through the Environment Act, and this would potentially result into a minor negative impact on SA Objective 3. The lack of policy could also result in adverse impact on climate change, flood risk and natural resources (SA Objectives 1, 3 and 7 respectively) and also exacerbate pollution aspects to some extent (SA Objective 6).

E.5.9.5 In the absence of a policy (Option C7c) to adapt to higher temperatures makes it uncertain to determine the potential effects on SA Objectives.

E.5.10 Issue C10: Climate Change Risk Assessments

- E.5.10.1 Question C10.1 presents three options relating to implementing Climate Change Risk Assessments, which have been evaluated below.
- E.5.10.2 Question C10.2 invites further comments relating Climate Change Risk Assessments, but does not identify any further policy options for assessment beyond those set out in C10.1.

Option C10.1a	Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment. This could this be in line with RCP 8.5 in order to maximise the level of interventions incorporated RCP 8.5 is a 'business-as-usual' scenario in which emissions continue to rise throughout the 21st century and climate change continues unabated. This scenario is suggested as a baseline as if new developments assess risks related to this scenario a more comprehensive approach to incorporating adaptation and resilience interventions can be achieved than applying a lower RCP scenario.
Option C10.1b	Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated Once an assessment has been undertaken, checklists are a useful way in enabling developers to identify which interventions they will incorporate into a new proposal. Stratford-on-Avon District Council's Development Requirements SPD Part V on Climate Change Adaptation and Mitigation is a way in which checklists can be applied in this way. Alternatively, there may be other tools or guidance that could be developed.
Option C10.1c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C10.1a	++	0	0	0	0	0	0	0	0	0	0	0	0
C10.1b	++	+	+	+	+	+	+	+	+	+	+	+	+
C10.1c	--	0	0	0	0	0	0	0	0	0	0	0	0

- E.5.10.3 In response to the climate change and its aggravating impact, policy Option C10.1a recommends that both new developments and retrofitted buildings in South Warwickshire should undertake a Climate Change Risk Assessment, thus a major positive impact on SA Objective 1 can be observed.
- E.5.10.4 As per policy Option C10.1b, it is required for new developments and changed old buildings to set out a range of climate change adaptation and mitigation measures, thus resulting a major positive impact on SA Objective 1. Moreover, using the checklist from 'Stratford-On-Avon District Council's Development Requirements SPD Part V on Climate Change Adaptation and Mitigation' this could also potentially extend the benefits to rest of the SA Objectives.
- E.5.10.5 Not having a policy for Climate Change Risk Assessments as suggested in Option C10.1c is not beneficial as South Warwickshire strives to achieve net zero along with its development objectives. Continuing with the existing process of new developments without the assessments could be detrimental in the long run in terms of climate change aspects (SA Objective 1).

E.5.10.6 A combination of both policy Option C10.1a and C10.1b is recommended as it would make Climate Change Risk Assessments necessary for both new developments and changes to existing buildings, and at the same time ensure that appropriate adaptation and mitigation strategies for all the SA Objectives have been identified.

E.5.11 Issue C11: Water Management

Option C11a	Do not include a policy on water quality in the SWLP Part 1 ‘Save’ existing policy content in this regard from existing plans and take forward through subsequent policy documents as appropriate. The spatial strategy should take account of the impact of strategic growth on relevant watercourses.
Option C11b	Include policy along similar lines to the existing policies, where supported by up-to-date evidence Prioritise water quality as a strategic issue, and develop a new policy based upon up-to date evidence.
Option C11c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
C11a	+	+	+	0	0	+	+	0	0	0	0	0	0
C11b	+	+	+	0	0	++	++	0	0	0	0	0	0
C11c	-	-	-	0	0	--	--	0	0	0	0	0	0

E.5.11.1 As recommended in Option C11a, continuing with the existing policy for water management in Part 1 of the plan ensures appropriate policy provisions relating to flood risk mitigation, efficient use of resources and quality for watercourses, surface water and groundwater, thus a minor positive impact on SA Objectives 1, 2, 3, 6 and 7 would be likely.

E.5.11.2 Policy Option C11b recommends a similar policy to that proposed under Option C11a, but supported by up-to-date evidence, thus extending a major positive impact on SA Objectives 6 and 7 and minor positive impact on SA Objectives 1, 2 and 3 for South Warwickshire as the maintenance of existing water resources, its efficient use and flood risk mitigation would be ensured.

E.5.11.3 Not having a policy for water management in South Warwickshire as suggested in Option C11c could be detrimental to water quality, with a lack of guidance and policy protection for the water environment, along with implications for the efficiency of water usage. Lack of policy would also potentially translate to lack of locally specific flood risk mitigation measures and pollution of existing watercourses, surface water and groundwater, although these provisions would be implemented to some extent by national policy. A minor negative impact could result on SA Objectives 1, 2 and 3, with potential for a major negative impact on SA Objectives 6 and 7.

E.5.12 Issue C12: Flood Risk

- E.5.12.1 This policy has the potential to contribute towards the management and mitigation of flood risk from different sources across South Warwickshire. If specific policy options or reasonable alternative approaches to managing flood are identified through the plan making process, these can be evaluated in the SA.

E.6 A well-designed and beautiful South Warwickshire

E.6.1 Issue D1: Strategic design principles

E.6.1.1 This issue regards a potential strategic design policy that will assist with the implementation of sustainable approaches to growth in terms of delivering well connected, safe and attractive neighbourhoods and promoting comprehensive and coordinated developments. If specific policy options are identified through the plan making process, these can be evaluated in the SA.

E.6.2 Issue D2: Design Codes and design guides

Option D2a	Develop a South Warwickshire Design Guide A single reference document. However, given the large geographical area this would cover, it would be challenging to tailor to the specifics of individual settlements or places, or guide significant change. This would need to be led by the Local Planning Authorities.
Option D2b	Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an ‘area’ in the case of a new settlement) where the spatial strategy identifies significant change. This option could take a more comprehensive view of areas of change identified in the SWLP, rather than focussing on a development site or sites (which it could do in addition), with a view to guiding all development proposals. These would expand upon the place-based principles approach in the Stratford-on-Avon District Core Strategy and would be led by the Local Planning Authority (or both authorities if relevant), in collaboration with local communities. There may also be potential for some or all of this work to come forward through Neighbourhood Development Plans.
Option D2c	Develop design guides/codes for strategic development sites/locations. Like the existing policies within Warwick District, this would seek to produce specific briefs for individual large scale development sites. These could be produced or led by the respective Local Planning Authority and/or by the developer(s) bringing forward the site.
Option D2d	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
D2a	+	+	+	+	+	0	+	0	+	+	+	+	+
D2b	+	++	++	++	++	0	++	0	++	++	++	+	+
D2c	+	+	+	+	+	0	+	0	+	+	+	+	+
D2d	0	0	0	-	-	0	0	0	0	0	0	0	0

E.6.2.1 Policy Option D2a favours developing a South Warwickshire Design Guide that would be led by the Local Planning Authorities. Considering that a strategic design code aims to form foundations on which future development for the residences is placed, pursuing this policy would certainly be beneficial for the region’s infrastructure aspects pertaining to wellbeing and safety, and connectivity and accessibility, hence a minor positive impact on SA Objectives 9, 10 and 11 can be observed. The benefits will also extend to SA

Objectives 12 and 13 i.e. education and economy as the policy favours comprehensive and mixed development. A strategic design policy is expected to cover the region's distinctiveness, build upon its unique character and ensure preservation of its natural resources; thus it is likely that the policy will cater to SA Objectives 4, 5 and 7 in a positive manner. Considering the environmental sustainability and climate change aspects of the strategic design principles, potential positive impacts on SA Objective 1, 2 and 3 can also be assumed.

- E.6.2.2 Policy Option D2b recommends design guides and/or codes for specific sites with significant changes identified by spatial strategies. Since the option is more comprehensive and localised, the positive impact on the SA Objectives would comparatively be more than pursuing policy Option D2a.
- E.6.2.3 Policy Option D2c seeks to produce briefs of individual large scale development sites in South Warwickshire. The policy option caters to developing design guides/ codes for only these development sites, hence only minor positive effects for SA Objectives will occur. Option D2c alone is comparatively not as favourable as Options D2a and D2b.
- E.6.2.4 Not having a policy as suggested in Option D2d is not favourable for South Warwickshire considering that the region aspires to be 'well-designed and beautiful'. Pursuing this option would mean that South Warwickshire would miss out on opportunities to integrate its local assets into the SWLP policies, thus a potential negative impact on SA Objectives 4 and 5 could occur.
- E.6.2.5 For achieving a well-designed and beautiful South Warwickshire, a combination of policy Options D2b and D2c is recommended to cover the circumstances of existing settlements and scale of change of development sites/locations.

E.6.3 Issue D3: Designing adaptable, diverse and flexible places

<p>Option D3a</p>	<p>Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire. This would be similar to the current approach in Stratford-on-Avon. It may facilitate a more locally tailored approach to density, though there may be a risk that in some locations that the efficiency of the land use may not be as high. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.</p>
<p>Option D3b</p>	<p>Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h. This would be similar to the approach of the current Warwick District Local Plan. It would set a minimum expectation across the whole of South Warwickshire irrespective of context, but in anticipation that this minimum is likely to be exceeded where context allows, for example in more urban areas. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.</p>
<p>Option D3c</p>	<p>Identify appropriate density ranges for different locations /areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places. This would draw upon the evidence base of existing density ranges across South Warwickshire (for example those ranges indicated in the Urban Capacity Study or the Settlement Design Analysis) and seek to replicate this. This might offer a more responsive approach to density, though it might not tackle matters of accessibility to public transport modes or other infrastructure referred to above. It also has the potential disadvantage of perpetuating patterns of development which could be considered less sustainable. For example, density is commonly</p>

	reduced toward the edges of development sites and therefore the edges of settlements. This can make it more challenging to increase the density of extensions to those sites/edges.
Option D3d	Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places. This approach would be different to recent local policy approaches, where the emphasis would be on accessibility to infrastructure including transport infrastructure. This approach would align with the suggestion in Paragraph 125 (e) of the NPPF. If a growth strategy focussed around sustainable travel were to be taken forward, there would be a clear synergy with this option. This option could also have a greater role in examining opportunities for densification in appropriate locations, and in determining the approach to any potential new settlements. The challenge of this approach is that it may result in a different density range in some places across South Warwickshire compared with the conventional approach.
Option D3e	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
D3a	+	0	+	+	+	0	+	+/-	+	+/-	+	+/-	+
D3b	+	0	+	+	+	0	+	+	++	+	++	+	++
D3c	+	0	+/-	+/-	+/-	0	+/-	+/-	+/-	+/-	+	+/-	++
D3d	+	0	+/-	+/-	+/-	0	+/-	++	++	++	++	++	++
D3e	-	0	0	-	-	0	-	+/-	+/-	+/-	-	+/-	-

E.6.3.1 Policy Option D3a identifies the significance of density but does not take into account an appropriate minimum density or range of densities across South Warwickshire. A minor positive impact could occur for SA Objectives 9, 11 and 13 as the region would potentially benefit in terms of housing, accessibility and concentrated economic activities to some extent. By encouraging densified development, the policy has the potential to influence the infrastructure of the region, such as waste, health and education (SA Objectives 8, 10 and 12), but the non-tailored approach makes it uncertain to determine the impact. As a wider impact of the densified development, the policy could also help to ensure that the region’s biodiversity is protected, the authentic landscape and the rural character are safeguarded, and natural resources are preserved, thus extending an indirect minor positive impact on SA Objectives 3, 4, 5 and 7. South Warwickshire would also benefit in terms of sustainability through reduced carbon footprint in the plan area, hence an indirect positive impact on SA Objective 1 is also indicated.

E.6.3.2 Policy Option D3b advocates a minimum density requirement, and would also allow implementation of specific design guides in accordance with Paragraph 125 of the NPPF, thus catering to housing, accessibility and concentration of economic activities. As a result, a major positive impact can occur for SA Objectives 9, 11 and 13. The specification of minimum density and the emphasis on the potential for exceeding this density where appropriate could potentially have a positive impact in terms of accessibility to infrastructure services (SA Objectives 8, 10 and 12). Just as for Option D3a, the positive impact would also extend to the region’s biodiversity, authentic landscape, rural character and natural resources (SA Objectives 3, 4, 5 and 7). The sustainability aspects of densified development would also extend a positive and indirect impact on SA Objective 1.

- E.6.3.3 Considering the large geographical area of South Warwickshire, policy Option D3c takes into account the varying density ranges. The responsive approach to density could potentially yield a major positive impact for SA Objective 13 and a minor positive impact for SA Objective 11 as densification would encourage concentration and accessibility to economic activities and infrastructure services. Because of its potential to steer unsustainable development patterns, the potential impact on the region's infrastructure development is uncertain (SA Objectives 8, 9, 10 and 12). The policy option could have potential disadvantage in terms of unsustainable development, thus making it uncertain to determine the potential impact on the region's biodiversity, authentic landscape, rural character and natural resources (SA Objectives 3, 4, 5 and 7). The uncertainty of potential unsustainable development would also extend to SA Objective 1.
- E.6.3.4 With the objective of adaptable, diverse and flexible places, policy Option D3d recommends identification of appropriate density ranges for varying locations based on accessibility in South Warwickshire. Aligning with Paragraph 125 (e) of NPPF, the policy option is the most favourable as it is focussed on sustainable travel and examining opportunities for densification in appropriate locations. This will have a major impact on SA Objectives 8, 9, 10, 11, 12 and 13 as the policy option caters to social objectives and accessibility to infrastructure services. Just as Options D3a, D3b and D3c, policy Option D3d for densification will also potentially extend a positive but indirect impact on SA Objective 1. With different density ranges across the region and uncertainty in approach for new settlements, it makes it difficult to ascertain the potential impact on the region's landscape and rural character, with uncertain impacts recorded for SA Objectives 3, 4, 5 and 7.
- E.6.3.5 As suggested in Option D3e, not having a policy for designing adaptable, diverse and flexible places could be detrimental for South Warwickshire's objective to be 'well-designed and beautiful'. The region aspires for mixed land-use with densified development to provide the neighbourhood with local needs. Thus, not having a policy in this regard could adversely impact accessibility and concentration of economic activities (SA Objective 11 and 13). Lack of defined policy for densification could be detrimental for the region's landscape, thus extending a minor negative impact on SA Objective 4.
- E.6.3.6 A combination of policy Options D3b and D3d is recommended to ensure adherence to minimum density requirements and examination of densification opportunities in appropriate locations. The combined policy will aid in South Warwickshire's social objectives through the creation of creation adaptable, diverse and flexible places.

E.6.4 Issue D4: Safe and attractive streets and public spaces

- E.6.4.1 This issue regards a potential high-level policy focused on public spaces and streets, in line with the Councils' aspirations to achieve a well-connected and safe public realm. If specific policy options are identified through the plan making process, these can be evaluated in the SA.

E.6.5 Issue D5: Protecting and enhancing heritage assets

- E.6.5.1 This issue regards a potential high-level strategic policy that seeks to protect and enhance heritage assets. If specific policy options are identified through the plan making process, these can be evaluated in the SA.

E.7 A healthy, safe and inclusive South Warwickshire

E.7.1 Issue W1: Pollution

E.7.1.1 This policy has the potential to contribute towards management and mitigation of pollution issues in South Warwickshire. If specific reasonable alternatives are identified through the plan making process, these can be evaluated in the SA.

E.7.2 Issue W2: Health Impact Assessments for major development

Option W2a	Include a policy on Health Impact Assessments. Developers would be required to submit a Health Impact Assessment/Screening report for all major developments. This would ensure that health impacts have been adequately considered and if required mitigation measures are in place and would align with current national government guidance. A threshold of what constitutes a major development would need to be agreed.
Option W2b	Do not include a policy on Health Impact Assessments. Although any major health impacts such as noise and pollution are likely to be picked up at the planning application stage it may not capture the cumulative health impacts in as much detail. There could also be the missed opportunity for addressing issues such as loneliness and isolation which is critical for rural communities.

Policy Option	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
W2a	+	+	+	+	0	+	0	0	0	++	0	0	0
W2b	0	0	0	0	0	0	0	0	0	-	0	0	0

E.7.2.1 South Warwickshire aspires to be a 'healthy, safe and inclusive' place for the people living, visiting or working in the plan area. Thus, policy Option W2a is favourable as developers would be required to undertake a Health Impact Assessment (HIA) for all major developments. A major positive impact on SA Objective 10 could occur, as the HIA would identify and evaluate any issues regarding health, seeking to maximise the proposal's positive effects and minimising negative effects. The benefits of the policy will also extend to SA Objective 6 since the HIA would be expected to deliver benefits for health that avoid or reduce polluting activities. Benefits might also be derived for climate change since HIAs sometimes promote and encourage non-motorised means of transportation where possible, hence a potential minor positive impact for SA Objective 1 could occur. Likewise, encouraging outdoor activities like walking or using a green gym may indirectly benefit biodiversity and landscape (SA Objective 3 and 4) as these attributes are both contributing factors to well-structured planning and provision of green infrastructure (GI). In turn, more GI will also help with flood risk management (SA Objective 2). HIAs will likely improve the approach to providing future-proofed health and wellbeing considerations as part of major development planning.

E.7.2.2 Option W2b recommends not having a policy for HIA as aspects like noise and pollution would be picked at the planning stage. The lack of a policy which would encourage health-led design initiatives would be a missed opportunity when considering some of the key issues associated with the health of the people living, visiting or working in the plan area. These issues include loneliness and isolation associated with the rural nature of South Warwickshire, hence a minor negative impact on SA Objective 10 could occur.

E.7.3 Issue W3: Ensuring the Built Environment provides Healthy and inclusive communities

Option W3a	Include an overall policy on health. This policy would aim to address all aspects of health and assist in creating communities which are safe, healthy, and inclusive for everyone across South Warwickshire as a whole. This would build on the existing health policies in both the Warwick District Local Plan and the Stratford Core Strategy.
Option W3b	Do not include a policy on health. This would mean that health is not picked up at a strategic level within part 1 of the plan and there could be a missed opportunity to make communities as safe, healthy and inclusive as possible. It could be included within part 2 where more detailed specific health policies would be developed.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
W3a	+	+	+	+	0	+	0	0	+	++	+	+	+
W3b	0	0	0	0	0	0	0	0	0	-	0	0	0

E.7.3.1 With the objective to ensure health and inclusivity through the built environment in South Warwickshire, Option W3a recommends having an overall policy on health. The policy is favourable, and would be expected to result in a major positive impact on SA Objective 10. The benefits of pursuing the policy include the likely development of infrastructure assets and accessibility to them in the plan area (SA Objectives 9, 11 and 12). This will support the communities and economies of the Plan area including tourism and service sectors which are key contributors to Warwickshire’s economy; the Covid pandemic has left a negative impact on many businesses and an increased focus on health planning will very likely help businesses (SA Objective 13). Such a policy would be likely to encourage robust green infrastructure planning which will lead to minor positive impacts on SA Objective 1, 2, 3, 4 and 6.

E.7.3.2 Option W3b is not favourable as it suggests not having a policy on health at the strategic level within part 1 of the plan. The absence of such a policy would represent a missed opportunity and potentially introduce adverse effects on health and wellbeing of the people living, visiting or working in the plan area. A minor negative effect on health (SA Objective 10) would be expected.

E.7.4 Issue W4: Public Open space for Leisure and Informal Recreation

- E.7.4.1 A policy relating to public open space and leisure facilities has the potential to contribute towards improved accessibility, connectivity and promoting healthy and happy communities. If specific reasonable alternatives are identified through the plan making process, these can be evaluated in the SA.

E.8 A well-connected South Warwickshire

E.8.1 Issue T1: 20-minute neighbourhoods

Option T1a	Include no policy on the principles of the 20-minute neighbourhood for new development. It might be considered more appropriate to consider such matters in the context of specific locations and places, but in this scenario it would not apply consistently across South Warwickshire within the Part 1 SWLP.
Option T1b	Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g. Building for a Healthy Life) within a broader overarching policy. This would recognise its relevance to the overarching principles of the SWLP, but suggest it doesn't warrant a bespoke policy. Alternatives may also be offered. This would raise the profile but not guarantee that a single approach would be consistently adopted across South Warwickshire.
Option T1c	Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals. This would set out very clear the vision and expectations for new developments and places, to ensure early design incorporation.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
T1a	-	-	-	-	-	-	0	0	0	-	-	0	0
T1b	+	+	+	+	+	+	+	0	+	+	++	+	+
T1c	++	+	+	+	+	+	+	0	++	++	++	++	++

E.8.1.1 Policy Option T1a resists the idea of blanket 20-minute neighbourhood principles since the need to plan for variation and distinctiveness within places might become difficult. Instead it promotes a bespoke approach to the provision of design principles. The liberal nature of such an approach misses the opportunity for suitable, and in many cases much needed, interventions to help ensure that climate change planning and adaptation materialises beyond positive rhetoric to good words that are associated with initiatives such as signing up to the climate change crisis. Positive place making and ensuring that certain standards are met that deliver environmental gains, infrastructure provision, health planning and allowing people to meet most of their daily needs within a 20-minute return walk from home, with access to safe cycling and local transport options is important. Such an approach need not pose a risk to distinctiveness and other special qualities that make places special.

E.8.1.2 Policy Option T1a represents a missed opportunity. Lack of such a policy will not itself introduce adverse effects but could exacerbate existing problems that could usefully be addressed by such an approach. These include congestion, air pollution, inconsistent approach to planning and introduction of developments which do not necessarily optimise sustainable transport options. Minor adverse effects are identified as a consequence of missed opportunity on the following SA Objectives: 1, 2, 3, 4, 5, 6, 10, 11.

E.8.1.3 A broader overarching policy for the SWLP, with reference to the principles of the 20-minute neighbourhood as suggested in Option T1b, is more favourable than Option T1a. A major positive impact on the region’s connectivity and accessibility can be observed (SA Objective 11). The benefits will also extend in terms of infrastructural development and social benefits, hence a minor positive impact on SA Objectives 9, 10, 12 and 13 could occur. Potential minor positive impacts could also be achieved in relation to SA Objectives 1, 2, 3, 4, 5, 6 and 7, conversely to Option T1a.

E.8.1.4 Option T1c is the most favourable for South Warwickshire as it sets out a definite policy that would require adherence to the principles of 20-minute neighbourhoods by including them within development proposals. As an early design incorporation, the policy will have major positive impact on the region’s aspirations for social, economic and environmental objectives. A major positive impact on infrastructural development and the accessibility to the services can be observed (SA Objectives 9, 10, 11, 12 and 13). The potential benefits will also extend towards biodiversity conservation, retention of the local landscape and rural character, and preservation of natural resources (SA Objectives 2, 3, 4, 5 and 7). Also, the environmental benefits in the long run will reduce emissions and ecological footprint. A major positive effect SA Objective 1, climate change, can be expected.

E.8.2 Issue T2: Sustainable transport accessibility across South Warwickshire

Option T2a	<p>Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure.</p> <p>This would be based on those living in rural areas, urban areas etc. It could include making changes to car parking standards and lowering them in areas where there are good active/public transport links in place such as in main urban centres. The policy would explore opportunities to use existing green and blue infrastructure as potential active travel options. The policy should also ensure that proposals are in line with the priorities as set out in the Local Transport Plan such as promoting and looking at alternative options for sustainable travel, e.g. car club initiatives, e scooters etc.</p>
Option T2b	<p>Do not include a policy which takes a hierarchical approach.</p> <p>There could be a general policy on sustainable transport which requires the necessary infrastructure and services (including the use of existing green and blue infrastructure) in place to allow both existing and new communities to become more sustainable and to have much easier access to key services and facilities. This would be regardless of whether residents live in rural or urban areas and could be an expansion of Policy CS.26 in the Core Strategy. This could also include a section on ensuring that proposals are in line with the priorities as set out in the Local Transport Plan. If a hierarchical approach is not taken it may still lead to those residents who have good access to public transport still continuing to use their cars for everyday use as there would be little incentive to change travel habits.</p>

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
T2a	+	+	+	+	+	+	0	0	0	+	++	0	+
T2b	-	0	0	0	0	-	0	0	0	-	+	0	-

E.8.2.1 Policy Option T2a favours having a policy which takes a hierarchical approach to prioritise transportation infrastructure in South Warwickshire, therefore major positive impact on SA Objective 11 can be observed. A minor positive impact would also extend to SA Objective 13 as the policy would ensure connectivity and access to economic activities. The

emphasis on active travel will deliver a minor positive impact on SA Objective 10 as it caters to the wellbeing of the people living, visiting or working in the plan area. The integration of green and blue infrastructure for sustainable transport accessibility could lead to a minor positive impact on SA Objectives 2, 3, 4 and 5. The reduced dependence on private car would also be likely to positively impact SA Objectives 1 and 6 in terms of reduced emissions and pollution.

E.8.2.2 Not having a policy for sustainable transport infrastructure would not be favourable for South Warwickshire. A general policy that is without a hierarchical approach will only extend a minor positive impact on SA Objective 11. Moreover, the region will lose the opportunities to improve the wellbeing of the people living, visiting or working in the plan area and ensure accessibility to the economic activities. As a result, a minor negative impact on SA Objectives 10 and 13 may occur. The continued dependence on the use of private cars will be detrimental in terms of emissions and pollution in the long run, hence a minor negative for SA Objectives 1 and 6 could occur.

E.8.3 Issue T3: Road travel, employment, and freight

Option T3a	Include a policy encouraging more sustainable road-based transport for businesses. It is acknowledged that employment and businesses will still need to operate using roads as their predominant form of transport particularly for the distribution of goods. This policy would encourage businesses to become more sustainable such as by using electric vehicles, introducing low emission zones, workplace levies, looking at the possibility of 'last mile' freight journeys (the very final stage of delivery) or driverless delivery pods whereby battery powered autonomous vehicles will be used to deliver goods. This could also include measures required in order to mitigate against any unacceptable impacts that road-based travel from business/employment may have on the environment such as poor air quality. This will help in meeting the climate change aspirations of the plan.
Option T3b	Do not include a policy encouraging more sustainable road-based transport for business. This may be beyond the scope of the Part 1 plan as it could be picked up under a more general sustainable transport policy rather than specifically for business and employment. If it is not considered to be a strategic issue for Part 1, a detailed policy could be developed as Part 2 of the plan.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
T3a	++	0	0	0	0	++	0	0	0	+	++	0	++
T3b	0	0	0	0	0	0	0	0	0	0	0	0	0

E.8.3.1 In alignment with South Warwickshire's objective for road travel, employment and freight, Option T3a is favourable as the policy encourages more sustainable road-based transport for businesses, thus a major positive impact on SA Objectives 11 and 13 would be observed. The use of electric and battery powered vehicles, introduction of low emission zones and workplace levies would have major positive impact on SA Objective 6 in terms of reduced pollutant emissions and improved air quality. The benefits will also extend to the health and wellbeing of the people living, visiting or working in the plan area, hence a minor positive impact on SA Objective 10 could potentially be observed. The sustainability measures identified will help addressing the climate aspirations of SWLP, hence a major positive impact on SA Objective 1 could be achieved.

E.8.3.2 Option T3b suggests not having a policy for sustainable road-based transport for businesses in Part 1 of the plan. As a result, the opportunity to achieve the benefits identified in the evaluation of T3a will be missed.

E.8.4 Issue T4: Smart Cities

E.8.4.1 This issue relates to the potential to integrate the ‘smart cities’ concept within the SWLP. If specific policy options are identified through the plan making process regarding smart cities, these can be evaluated in the SA.

E.9 A biodiverse and environmentally resilient South Warwickshire

E.9.1 Issue B1: Areas of restraint

Option B1a	Maintain Areas of Restraint and identify appropriate areas within Warwick District Maintaining Areas of Restraint as a strategic policy approach will help protect parcels of land that help preserve the structure and character of settlements within the plan area. As part of identifying areas in Warwick Stratford designations would be reviewed.
Option B1b	Remove Areas of Restraint designations Remove the Areas of Restraint from Stratford-on-Avon District and continue without them within Warwick District. Open areas of land that serve to preserve the structure and character of settlements will be considered by other means.
Option B1c	Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District. This option sees a continuation of the current approach. Stratford-on-Avon would maintain its Areas of Restraint and Warwick District continues without this designation. This would result in a disjointed approach.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
B1a	+	+	++	++	++	++	++	0	0	+	0	0	+
B1b	0	0	+/-	+/-	+/-	+/-	+/-	0	0	0	0	0	0
B1c	+	0	+	+	+	+	+	0	0	0	0	0	0

E.9.1.1 Policy Option B1a recommends maintaining ‘Areas of Restraint’ in Stratford-on-Avon District and identification of appropriate areas within Warwick District in order to protect parcels of land with structures and characters unique to this region, thus a major positive impact for SA Objectives 3, 4 and 5 could be achieved. Maintaining areas of restraint would also contribute towards preservation of natural resources and emission reduction, thus a major positive impact on SA Objectives 6 and 7 could also be achieved. With the thriving natural world, the benefits of pursuing this option would also extend to climate, economy, flooding, health and wellbeing, hence a minor positive impact for SA Objectives 1, 2, 10 and 13 could be observed.

E.9.1.2 Removing areas of restraint designations from Stratford-on-Avon District as suggested in Policy Option B1b could be detrimental for South Warwickshire’s objective for biodiversity and environmental resilience. The policy recommends preserving the structure and character of settlements by other means, thus making it uncertain to determine the potential impact on SA Objectives 3, 4, 5, 6 and 7.

E.9.1.3 Pursuing policy Option B1c which recommends maintaining Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District, would only be partially beneficial to achieve South Warwickshire’s objective for biodiversity and environmental resilience. The policy option is not favourable as compared to Option B1a as the disjointed approach will only have minor positive impact in terms of protection of

parcels of land with structures and characters unique to this region, preservation of natural resources and emission reduction (SA Objectives 3, 4, 5, 6 and 7).

E.9.2 Issue B2: Vale of Evesham Control Zone

E.9.2.1 This issue poses a question relating to potential removal of the Vale of Evesham Control Zone policy from Stratford-on-Avon’s Core Strategy. If specific policy options or reasonable alternatives are identified through the plan making process regarding this zone, these can be evaluated in the SA.

E.9.3 Issue B3: Special landscape areas

Option B3a	Introduce Special Landscape Areas across all of South Warwickshire Introducing Special Landscape Areas across all of South Warwickshire would see existing SLA’s refreshed/maintained and areas of Special landscape quality introduced within Warwick District. Developments within Special Landscape Areas would have to respect the current and historic relationship of that settlement within the surrounding landscape. To determine whether the existing SLA’s within Stratford remain relevant and where any SLA’s within Warwick should be located, an updated study would need to be undertaken.
Option B3b	Maintain Special landscape Areas within Stratford-on-Avon District but don’t introduce them within Warwick District Keeping Special Landscape areas within Stratford-on-Avon District and not introducing them within Warwick District would lead to a disjointed approach, but one that maintained the status quo.
Option B3c	Discard Special Landscape Areas and bolster general landscape policy Discarding Special Landscape Areas within Stratford-on-Avon would bring it in line with the approach of the existing Warwick Local Plan. If this approach were taken forward developments would be considered using a general landscape policy.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
B3a	+	0	+	++	++	+	+	0	0	+	0	0	+
B3b	0	0	0	+	+	0	0	0	0	0	0	0	0
B3c	-	0	-	-	-	-	-	0	0	0	0	0	-

E.9.3.1 With reference to South Warwickshire’s objective to maintain its authentic landscape and protect and manage the associated historic and rural character, Option B3a is most favourable as the policy advocates introducing Special Landscape Areas (SLAs) across the entire region. A policy of this nature could reduce the adverse cumulative impact of inappropriate developments, or developments that are not in keeping with the character of the area, hence a potentially major positive impact for SA Objectives 4 and 5 could be achieved. Besides undertaking an updated study, the benefits of the policy could potentially also extend in terms of positive impact on climate change, preservation of the region’s biodiversity and natural resources, and enhancement of the wellbeing with reduced air pollution in the region (SA Objectives 1, 3, 6, 7 and 10). Introducing SLAs would potentially conserve and enhance South Warwickshire’s distinctive landscape, encouraging more tourism to the region and hence a minor positive impact on SA Objective 13 could also be observed.

E.9.3.2 Maintaining status quo for South Warwickshire as suggested in policy Option B3b, with SLAs retained in Stratford-on-Avon District but not introduced to Warwick District, is not favourable as compared to Option B3a. The disjointed approach will only extend a minor positive impact for SA Objectives 4 and 5.

E.9.3.3 Discarding SLA and going ahead with a general landscape policy as suggested in Option B3c potentially could be detrimental for South Warwickshire’s authentic landscape and rural heritage (SA Objectives 4 and 5). Considering that several councils have opted to maintain SLA, the lack of a dedicated policy will potentially extend negative impacts on SA Objectives 1, 3, 6 and 7 in the long term. Furthermore, without SLA, South Warwickshire will lose the potential tourism opportunities and hence a potential negative impact on SA Objective 13 could also occur.

E.9.4 Issue B4: Protecting the Cotswold National Landscape/Cotswold Area of Outstanding Natural Beauty (AONB) and its surrounding areas

Option B4a	Maintain the current policy approach, without the use of a buffer Maintaining the current policy approach in line with National Planning Policy Framework would result in little to no change in the level of protection afforded to the Cotswold AONB.
Option B4b	Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape Creating a buffer zone around the Cotswold AONB would help ensure regard is given to the potential impacts of development outside of the National Landscape, on the natural beauty of the National Landscape. It is possible that a distance based buffer is used around the entirety of the special landscape area (e.g 3km), or alternatively a sinuous buffer based on landscape sensitivity in different areas is created in consultation with the Cotswold Conservation Board. This would mean that the buffer is thicker in some areas than others, and could be identified as a special landscape area. Details of the buffer would be considered as the plan progresses should this option be preferred. However, it is worth noting that the level of protection afforded to the Cotswold AONB would not change. Such an approach may simply help officers when determining planning applications.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
B4a	0	0	0	0	0	0	0	0	0	0	0	0	0
B4b	+	+	++	++	++	+	+	0	-	0	-	0	0

E.9.4.1 Maintaining the current policy approach as suggested in policy Option B4a will have negligible impact on the SA Objectives as there would be little to no change in the level of protection to the Cotswold National Landscape/AONB.

E.9.4.2 In alignment with the objective to protect the Cotswold National Landscape/AONB and its surrounding areas, policy Option B4b recommends amending the current policy. The inclusion of buffer around the periphery would be expected to have a major positive impact on SA Objectives 3, 4 and 5 as the policy would help to enhance natural beauty of the area and its setting, conserve the scenic landscapes, maintain the rural character of the region. The minimised noise, traffic and light pollution will also impact SA Objective 6 positively. The benefits would also extend to SA Objectives 1, 2 and 7 as the region could indirectly

benefit from climate change resilience and conservation of natural resources. However, the restrictions due to the proposed buffers could also potentially extend some negative impact on the infrastructure development (SA Objectives 9 and 11).

E.9.5 Issue B5: Environmental Net Gain

Option B5a	Explore and pursue an integrated Environmental Net Gain Policy To consider Environmental net gain as a new and pioneering approach to support natures recovery. Should this approach be taken, further work will be required to determine how environmental net gain will work in practice. However, it is expected that it will allow more flexibility for developers, and result in more tangible environmental, social and economic improvements. This approach will not be to the detriment of Biodiversity Net Gain, of which a minimum 10% net gain will still be required under the Environment Act, the flexibility will be made around this legal requirement to enhance the natural capital of an area.
Option B5b	Explore environmental net gain through separate policies A more targeted, and arguably less flexible approach to Environmental net gain would be to have separate polies for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. With each policy having its own requirements. Each ecosystem service would be viewed and dealt with in isolation, risking a disjointed approach. As per the Environment Act, a minimum 10% Biodiversity Net Gain will be required as part of this approach.
Option B5c	None of these

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Option	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
B5a	++	++	++	++	+	++	++	0	0	+	0	0	0
B5b	++	+	++	+	0	++	++	0	0	+	0	0	0
B5c	-	-	-	-	0	-	-	0	0	0	0	0	0

E.9.5.1 An integrated Environmental Net Gain Policy as suggested in Option B5a would be favourable for South Warwickshire as the region aspires to protect and enhance green areas, natural habitats and biodiversity. As a result, a major positive impact on SA Objectives 3, 4 and 7 can be observed. The compensatory measures and net gains would aid in carbon offsetting, climate change resilience and reduction in emissions, hence major positive impacts for SA Objectives 1, 2 and 6 can also be observed. The benefits will also extend to the embedded cultural heritage in the region (SA Objective 5), through potential to indirectly conserve and enhance historic landscapes and rural character. It is expected that the approach for nature recovery will also extend a positive impact in terms of wellbeing of the people living, visiting or working in the plan area, hence a minor positive impact on SA Objective 10 could be observed. Policy Option B5a is most favourable as it allows the flexibility for developers to adhere to minimum set standards for the overall environmental gain.

E.9.5.2 Policy Option B5b recommends implementing Environmental Net Gain requirements through separate policies for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. The impact on SA objectives by pursuing this policy option would remain the same as Option B5a but the less flexible and disjointed approach would make it less favourable option overall for South Warwickshire. A major positive impact is identified in relation to climate change (SA Objective 1), biodiversity (SA Objective 3), pollution (SA

Objective 6) and natural resources (SA Objective 7). A minor positive impact could also extend to flood risk (SA Objective 2), landscape (SA Objective 4) and health and wellbeing (SA Objective 10).

- E.9.5.3 Not having a policy for environmental net gain as suggested in policy Option B5c could be detrimental for South Warwickshire. The lack of dedicated policy is not favourable as it would negatively impact the region's natural capital (SA Objectives 1, 2, 3, 4, 6 and 7).

E.9.6 Issue B6: Wildbelts designations

- E.9.6.1 This issue relates to the potential identification of Wildbelts designations in South Warwickshire through the SWLP, contributing towards nature recovery. If specific policy options or reasonable alternatives are identified through the plan making process regarding these designations, these can be evaluated in the SA.

E.9.7 Issue B7: Minerals

- E.9.7.1 This issue regards potential to highlight links between the SWLP and the Minerals Plan produced by Warwickshire County Council, but does not identify any specific policy options at this stage. If policy options are identified through the plan making process regarding minerals, these can be evaluated in the SA.

E.9.8 Issue B8: Agricultural Land

- E.9.8.1 A future policy regarding the protection of best and most versatile (BMV) agricultural land would be expected to yield positive effects with regard to the conservation of natural resources and ecosystem services. If specific policy options are identified through the plan making process regarding BMV land, these can be evaluated in the SA.

E.9.9 Issue B9: Protecting Biodiversity and Geodiversity Assets

- E.9.9.1 A future policy regarding the safeguarding of biodiversity / geodiversity sites of national and local importance, as well as non-designated sites, would provide an opportunity to promote the conservation and enhancement of South Warwickshire's natural environment and aid nature recovery alongside the proposed growth. If specific policy options are identified through the plan making process regarding these assets, these can be evaluated in the SA.



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South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Birmingham City Council

23rd May 2022

Attendees

- John Careford, Head of Development@ SDC
- Philip Clarke, Head of Development @ WDC
- Maria Dunn, Planning Policy Manager @ BCC

SWLP Update

- Timetable - approved with Issues and Options late summer 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
- Scope of plan – initial Part 1 plan setting development strategy, key development principles and identifying strategic sites. Running to 2050 so unlikely to identify all sites and will include broad locations. Overarching principles of climate change, biodiversity, connectivity and infrastructure.
- Technical evidence – settlement analysis being undertaken in house including connectivity and infrastructure assessments. Consultants commissioned to undertake studies re: climate change, heritage, town centres, G&T, urban capacity, SFRA Part 1 and SA/SEA. CW HEDNA also underway.
- Latest position – Following on from Scoping & Call for Sites consultation last year, have published results at www.southwarwickshire.org.uk/swlp and working up Issues & Options version. Stakeholder workshops planned for June to help devise spatial strategy.

Local Plan Update

SDC Local Plans

- Site Allocations Plan
 - Revised Preferred Options approval on 23rd May and then consultation early summer
 - Continue to address Birmingham & BC HMA shortfall through reserve sites
 - Proposal to address shortfall through application of sustainably located sites as opposed to 1/9 split

WDC Local Plans

- Net Zero Carbon DPD – Reg19 consultation
- Gigafactory – consented and understood that occupier being sought

Birmingham Local Plan

- Full review and incorporating some AAPs. Slight delay to Issues and Options now Autumn 2022 with adoption mid-2026.
- Relationship to new planning system and transitional arrangements.

Strategic Cross-Boundary Issues

General

- BCC and SDC sit on BBCHMA DtC officer group and work together on various strategic planning issues. Member group being established with SoCG being prepared.

Housing

- BCC and SDC sit on BBCHMA DtC officer group and work together re housing supply monitoring and addressing shortfall.
- Biggest issue to address shortfall
- Concern with 35% increase
- Circa 7000 homes per annum need versus delivery of circa 4,000
- Affordability issue so will be certain types of people who will relocate unlikely to be minimum wage.
- Undertaking urban capacity work (appointed Urban Intelligence)
- Strong market for city centre living seems to be continuing but important to get mix right. Completions dominated by 1&2 bed flats. Langley will assist with family housing.
- SDC and WDC will need to be confident and robustness of BCC work if SW to assist in meeting shortfall
- BCC HEDNA about to be published and will review once census published. CW HEDNA to be published late summer following high level population projections.
- Uncertainty re planning reforms and standard housing methodology

Employment

BBCHMA group preparing Strategic Employment Site Study

Green Belt

- Reviewing previous work and many arguments re landscape and absorption ran last time remain valid

Infrastructure

- Benefits to those Districts that accommodate shortfall
- Poor rail service
- Good road connections so risk is if you don't improve rail then will just encourage car use

Other Issues

Gypsies & Travellers

- BCC will meet its own needs but likely issue with TSP yard so may need to look to neighbours. SW to meet its need.
- Leap frogging or cascade – to what extent do immediate neighbours have to assist?

Climate Change

- Wider implications and would be keen to share learning

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Cherwell Council

20th June 2022

Attendees

- John Careford, Head of Development@ SDC
- Philip Clarke, Head of Development @ WDC
- Andrew Maxted, Policy & Conservation Manager @ CDC

SWLP Update

- Timetable - approved with Issues and Options late summer 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
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Cherwell Local Plan

- Oxfordshire 2050 plan being prepared by the 5 LPAs to include housing numbers for each District, possible broad locations but no allocations.
- Oxfordshire LP timetable now aligns with Cherwell LP. Reg 18 autumn with submission by end 2023.
- Not expecting strategy to change significantly as main settlements continue to represent the most sustainable locations, however this work is ongoing

Strategic Cross-Boundary Issues

Housing

- Looking to accommodate growth within Oxfordshire so won't be seeking neighbours to accommodate any shortfall

Employment

- BBCHMA group preparing Strategic Employment Site Study
- Desire for general industrial as opposed logistics in SW
- Proposal being progressed for J10 Heyford Strategic Rail Freight Interchange – this sits outwith the LP process.
- Employment will be most relevant cross-boundary issue with focus at M40 junctions

Infrastructure

- GI Strategy being prepared
- Main infrastructure challenges are essentially highways at Bicester

Other Issues

Gypsies & Travellers

- Oxfordshire-wide GTAA to be completed shortly. Not anticipating shortfalls requiring cross-boundary.

Climate Change

- Appointed Bioregional to advise on policy options

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Cotswold District Council

16th May 2022

Attendees

- John Careford, Head of Development@ SDC
- Cllr Rachel Coxcoon, Portfolio Holder for Climate Change & Forward Planning @ CDC
- James Brain, Forward Planning Manager @ CDC
- Philip Clarke, Head of Development @ WDC (apologies)

SWLP Update

- Timetable - approved with Issues and Options late summer 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
- Scope of plan – initial Part 1 plan setting development strategy, key development principles and identifying strategic sites. Running to 2050 so unlikely to identify all sites and will include broad locations. Overarching principles of climate change, biodiversity, connectivity and infrastructure.
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Local Plan Update

SDC Local Plans

- Site Allocations Plan
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 - Continue to address Birmingham & BC HMA shortfall through reserve sites
 - Proposal to address shortfall through application of sustainably located sites
 - Site identification excludes Cotswolds National Landscape area

CDC Local Plans

- Partial review of CDC Local Plan
 - To address potential 5YHLS issues and modifications to DM policies
 - Focus on “green to the core” approach

- o Reg 19 consultation, submission 2023, adoption 2024
- Technical work underway including SFRA but not aware of any cross-boundary issues

Strategic Cross-Boundary Issues

CDC, SDC and WDC all declared climate change emergencies. Challenge how to deliver on those commitments including through the local plan process.

Housing

- Both councils expecting to meet own needs. SWLP to address Birmingham and Coventry shortfalls
- Wider strategic implications of Long Marston Airfield Garden Village
- Potential for Long Marston Airfield Garden Village to assist with meeting longer-term CDC needs – needs further consideration
- Role of places like Shipston-on-Stour and relationship to Moreton-in-Marsh i.e., places that have outgrown the scale of their original services and infrastructure
- CDC exploring how to apply 15min neighbourhood concept to rural areas

Employment

- Future role of Long Marston Rail Innovation Centre
- Future role of Fire Service College

Cotswolds National Landscape

- Covers 80% of CDC area
- Local needs approach
- Possibility of CNL buffer zone in SDC to strengthen GI and biodiversity?
- CDC Local Plan effective in applying similar level of protection to their Special Landscape Areas as to the CNL

Other Issues

Gypsies & Travellers

- SDC new GTAA commissioned for South Warwickshire
- CDC part of Gloucestershire-wide GTAA
- CDC Commitment to meet needs locally although challenge re wider definition
- SDC to address issue through SWLP
- Issue to be kept under review

Vale of Evesham Control Zone

- Policy being retained unless reviewed as part of plan-making

Actions

- CDC Settlement Accessibility Matrix and Renewable Energy Study - JB to circulate
- CDC Special Landscape Area approach - JB to circulate
- CDC Sustainable Transport and economic development contacts - JB to circulate
- CDC Fire Service College Masterplan – JB to circulate
- SDC to engage CDC re LMA Sustainable Transport Options Study, SWLP Stakeholder Sessions and SW Economic Strategy – JC to invite

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Coventry City Council

1st July 2022

Attendees

- John Careford, Head of Development @ SDC
- Philip Clarke, Head of Development @ WDC
- David Butler, Head of Planning Policy & Environment @ CCC

SWLP Update

- Timetable - approved with Issues and Options autumn 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
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 - Proposal to address shortfall through application of sustainably located sites as opposed to 1/9 split

WDC Local Plans

- Net Zero Carbon DPD – Reg19 consultation now ended

Coventry City Local Plan

- Preparation for local plan review once HEDNA finalised late autumn

Strategic Cross-Boundary Issues

- CCC, SDC and WDC sit on Coventry and Warwickshire DTC group to commission local plan evidence base and monitoring of housing and employment supply
- Direct relationship between CCC and WDC and previously WDC has accommodated some of CCC shortfall
- HEDNA underway to inform housing and employment requirements and issue of any shortfall

Other Issues

South of Coventry

- Work progressing on partnership to explore how to bring forward existing commitments to the south of Coventry including the University site (which straddles the boundary) and the A46 Link Road
- No progress on University SPD
- Student numbers issue in Leamington but not considered to be a strategic cross-boundary issue. CCC has commissioned work on PBSA
- Impact of HS2 on area

Infrastructure

- A46 Link Road – see South of Coventry
- Potential VLR link southwards – depends on trip generation
- Potential rail station at Kings Hill
- Local Nature Recovery Strategies – CCC initially included within Birmingham and Black Country but more logical links with Warwickshire
- Joint CW GI study underway

Gypsies & Travellers

- CCC addressing own needs with current planning application. Not intending to look to neighbours to address shortfall
- SDC & WDC doing GTAA for SWLP – looking to meet own needs.

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Redditch and Bromsgrove Councils

13th June 2022

Attendees

- John Careford, Head of Development@ SDC
- Philip Clarke, Head of Development @ WDC
- Ruth Bamford, Head of Planning @ RBC & BDC
- Mike Dunphy, Planning Policy Manager @ RBC & BDC

SWLP Update

- Timetable - approved with Issues and Options late summer 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
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- Technical evidence – settlement analysis being undertaken in house including connectivity and infrastructure assessments. Consultants commissioned to undertake studies re: climate change, heritage, town centres, G&T, urban capacity, SFRA Part 1 and SA/SEA. CW HEDNA also underway.
- Latest position – Following on from Scoping & Call for Sites consultation last year, have published results at www.southwarwickshire.org.uk/swlp and working up Issues & Options version. Stakeholder workshops planned for June to help devise spatial strategy.

Local Plan Update

SDC Local Plans

- Site Allocations Plan
 - Revised Preferred Options approval on 23rd May and then consultation early summer
 - Continue to address Birmingham & BC HMA shortfall through reserve sites
 - Proposal to address shortfall through application of sustainably located sites as opposed to 1/9 split

WDC Local Plans

- Net Zero Carbon DPD – Reg19 consultation

Redditch and Bromsgrove Local Plans

- HEDNA published on website. Suggests consideration of employment land a motorway junction.
- RBC & BDC to write to neighbouring authorities shortly regarding housing numbers issue.
- RBC & BDC MoU:
 - Joint evidence & HMA DtC Issues
 - Reallocation of RBC to BDC
 - Separate local plans – BDC slightly more advanced than RBC
- Relationship to new planning system and transitional arrangements.

Strategic Cross-Boundary Issues

General

- RBC, BDC and SDC sit on BBCHMA DtC officer group and work together on various strategic planning issues. Member group being established with SoCG being prepared.

Housing

- RBC housing numbers significantly reduced under standard method to extent that existing supply can run to 2050. How will RBC allocations in BDC be utilised moving forwards?
- Expectation that BDC will meet their own needs.

Employment

- BBCHMA group preparing Strategic Employment Site Study
- Notwithstanding housing issue, RBC will have an employment land requirement and may look to neighbours to assist.

Infrastructure

- Issues relate to sustainable transport and 20min neighbourhood

Other Issues

Gypsies & Travellers

- BDC numbers small but looking within District. RBC no GTAA.

South Warwickshire Local Plan
Duty to Co-Operate Note
Meeting with Rugby Borough Council
30th June 2022

Attendees

- John Careford, Head of Development @ SDC
- Nicola Smith, Chief Officer Growth and Investment @ RBC
- Philip Clarke, Head of Development @ WDC (apologies)

SWLP Update

- Timetable - approved with Issues and Options late summer 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
- Scope of plan – initial Part 1 plan setting development strategy, key development principles and identifying strategic sites. Running to 2050 so unlikely to identify all sites and will include broad locations. Overarching principles of climate change, biodiversity, connectivity and infrastructure.
- Technical evidence – settlement analysis being undertaken in house including connectivity and infrastructure assessments. Consultants commissioned to undertake studies re: climate change, heritage, town centres, G&T, urban capacity, SFRA Part 1 and SA/SEA. CW HEDNA also underway.
- Latest position – Following on from Scoping & Call for Sites consultation last year, have published results at www.southwarwickshire.org.uk/swlp and working up Issues & Options version. Stakeholder workshops planned for July to help devise spatial strategy.

Local Plan Update

SDC Local Plans

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 - Proposal to address shortfall through application of sustainably located sites as opposed to 1/9 split

WDC Local Plans

- Net Zero Carbon DPD – Reg19 consultation

Rugby Local Plan

- 2019 -2031 looking to do a partial review with full review to follow subsequently but will depend on emerging housing and employment numbers
- Previously, focus has been on Rugby town.

Strategic Cross-Boundary Issues

- RBC, SDC and WDC sit on Coventry and Warwickshire DTC group to commission local plan evidence base and monitoring of housing and employment supply
- HEDNA underway

Other Issues

Gypsies & Travellers

- RBC doing G&TLP to allocate sites and doing call for sites in Sept. Adoption 2024. GTAA due to report summer 22 which will determine requirements. Results of CfS may determine whether needs are met within District
- SDC & WDC doing GTAA for SWLP – looking to meet own needs.

SUE

- Ensure get right master-developer to deliver SUEs that forward fund infrastructure

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Solihull MBC

3rd May 2022

Attendees

- John Careford, Head of Place & Economy @ SDC & WDC
- Mark Andrews, Head of Planning & Economy @ SMBC
- Gary Palmer, Planning Policy Manager @ SMBC

SWLP Update

- Timetable - approved with Issues and Options late summer 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
- Scope of plan – initial Part 1 plan setting development strategy, key development principles and identifying strategic sites. Running to 2050 so unlikely to identify all sites and will include broad locations. Overarching principles of climate change, biodiversity, connectivity and infrastructure.
- Technical evidence – settlement analysis being undertaken in house including connectivity and infrastructure assessments. Consultants commissioned to undertake studies re: climate change, heritage, town centres, G&T, urban capacity, SFRA Part 1 and SA/SEA. CW HEDNA also underway.
- Latest position – Following on from Scoping & Call for Sites consultation last year, have published results at www.southwarwickshire.org.uk/swlp and working up Issues & Options version. Stakeholder workshops planned for June to help devise spatial strategy.

Local Plan Update

SDC Local Plans

- Site Allocations Plan
 - Revised Preferred Options approval on 23rd May and then consultation early summer
 - Continue to address Birmingham & BC HMA shortfall through reserve sites
 - Proposal to address shortfall through application of sustainably located sites as opposed to 1/9 split

WDC Local Plans

- Climate Change DPD – Reg19 consultation commenced
- South of Coventry Area Masterplan – formal governance being set up to co-ordinate various existing proposals e.g. A46 link, University of Warwick, Kings Hill, Gigafactory etc

SMBC Local Plans

- Emerging Local Plan will run to 2036/37 currently at examination. Adoption expected by early 2023. Review trigger expected within 5 years.

Strategic Cross-Boundary Issues

Flexible approach of SWLP could tie in re timescales with SMBC LP Review re any joint Area Action Plans *should* they be considered appropriate

Housing

- SMBC expecting to meet its own needs; challenge is contributing to meeting others. Not expecting SW to meet SMB needs.
- Earlswood site submitted through SW CFS (see employment)
- Hockley Heath sites submitted through SW CFS – infrastructure concerns

Employment

- J2 M42 site submitted through SW CFS and promoted as potential option in SWLP Scoping Consultation – concerns expressed by National Highways re M42 capacity
- RAF Honiley Site

Infrastructure

- M42 capacity
- A46 Link Road
- UK Central being seen as an Infrastructure Opportunity rather than employment land

Other Issues

Gypsies & Travellers

- Needs to be met by respective authorities

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with West Northants Council

6th June 2022

Attendees

- John Careford, Head of Development@ SDC
- Philip Clarke, Head of Development @ WDC
- Richard Wood, Interim Head of Planning Policy @ WNC
- Colin Staves @ WNC (Apologies)

SWLP Update

- Timetable - approved with Issues and Options late summer 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
- Scope of plan – initial Part 1 plan setting development strategy, key development principles and identifying strategic sites. Running to 2050 so unlikely to identify all sites and will include broad locations. Overarching principles of climate change, biodiversity, connectivity and infrastructure.
- Technical evidence – settlement analysis being undertaken in house including connectivity and infrastructure assessments. Consultants commissioned to undertake studies re: climate change, heritage, town centres, G&T, urban capacity, SFRA Part 1 and SA/SEA. CW HEDNA also underway.
- Latest position – Following on from Scoping & Call for Sites consultation last year, have published results at www.southwarwickshire.org.uk/swlp and working up Issues & Options version. Stakeholder workshops planned for June to help devise spatial strategy.

Local Plan Update

SDC Local Plans

- Site Allocations Plan
 - Revised Preferred Options approval on 23rd May and then consultation early summer
 - Continue to address Birmingham & BC HMA shortfall through reserve sites

WDC Local Plans

- Net Zero Carbon DPD – Reg19 consultation

West Northants Local Plan

- Part 2 Plans adopted for former South Northants and former Daventry District, former Northampton Borough at examination. Strategic Plan options consultation autumn 2021 and analysing responses and reporting June 2022
- Plan period 2051 under review
- New planning policy committee created - looking to set up informal member arrangements
- Reflections on Part 1 and Part 2 approach – be clear on scope and content of plans to avoid duplication of policies

Strategic Cross-Boundary Issues

General

- Short boundary with SDC. Biggest town relevant to SW is Daventry and some large villages and may be extensions to these but not strategic cross boundary implications.
- Woodford Halse has seen some employment growth recently but quite isolated. Byfield application circa 70-80 homes.

Landscape

- AONB work now with Natural England but WNC not progressing it at moment

Housing, Employment, Infrastructure

- No strategic issues

Other Issues

Gypsies & Travellers

- WNC GTAA being refreshed currently but will meet own needs
- SW GTAA being undertaken

HS2

- No strategic issues
- Environmental enhancements from an ecology perspective but not a local plans issue

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Worcestershire County Council

17th October 2022

Attendees

- John Careford, Head of Development @ SDC
- Philip Clarke, Head of Place, Arts & Economy @ WDC
- Marianne Pomeroy, Team Leader (Minerals & Waste Planning Policy) @ WCC
- Karen Hanchett, Transport Planning and Development Management Manager @ WCC

SWLP Update

- Timetable - Issues and Options expected January 2023, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
- Delay to timetable owing to Census and HEDNA.
- Scope of plan – initial Part 1 plan setting development strategy, key development principles and identifying strategic sites. Running to 2050 so unlikely to identify all sites and will include broad locations. Overarching principles of climate change, biodiversity, connectivity and infrastructure.
- Technical evidence – settlement analysis being undertaken in house including connectivity and infrastructure assessments. Consultants commissioned to undertake studies re: climate change, heritage, town centres, G&T, urban capacity, SFRA Part 1 and SA/SEA.
- Latest position – Following on from Scoping & Call for Sites consultation last year, have published results at www.southwarwickshire.org.uk/swlp and working up Issues & Options version. Stakeholder workshops undertaken during the summer to help devise spatial strategy.
- Have met with adjoining LPAs and now speaking with adjoining county councils

Local Plan Update

SDC Local Plans

- Site Allocations Plan
 - Revised Preferred Options approval on 23rd May and then consultation early summer
 - Continue to address Birmingham & BC HMA shortfall through reserve sites
 - Reserve sites – south of Stratford + Mappleborough Green adjacent to RBC LP allocation

WDC Local Plans

- Net Zero Carbon DPD – Reg19 consultation

South Worcestershire Development Plan

- Reg19 about to start end of this year
- Parkway new settlement 5,000 in this period and 5,000 in next period

Worcestershire Local Transport Plan

- LTP5 to kick off (awaiting full guidance due Autumn 2022)
- Adoption expected 2024

Worcestershire Minerals Local Plan

- Adopted July 2022

Worcestershire Minerals Site Allocations Plan

- Preferred Option summer 2023
- Site put forward by landowner @ Harvington near county boundary. No decisions yet on whether this site will be allocated, but Preferred Options document will set out reasons for site selection or why sites not considered suitable, and draft policies for the proposed allocations.
- Reasonably limited cross-boundary issues (as per recent correspondence).

Worcestershire Waste Local Plan

- Adopted 2012, likely start review in 2023/24 subject to funding.

Strategic Cross-Boundary Issues

3 potential issues:

- Long Marston Airfield / Honeybourne
- A435 - WCC working with consultants building county-wide model MRN scheme
- A46

Other Issues

Moving forward – joint meeting with county councils and district councils regarding strategic matters for the South Warwickshire Local Plan

South Warwickshire Local Plan

Duty to Co-Operate Note

Meeting with Wychavon Council

6th July 2022

Attendees

- John Careford, Head of Development @ SDC
- Philip Clarke, Head of Development @ WDC
- Jo Symons, Head of Policy @ WDC & MHDC

SWLP Update

- Timetable - approved with Issues and Options late autumn 2022, Preferred Options Summer 2023, Submission by end 2024, examination early 2025 and adoption second half of 2025.
- Scope of plan – initial Part 1 plan setting development strategy, key development principles and identifying strategic sites. Running to 2050 so unlikely to identify all sites and will include broad locations. Overarching principles of climate change, biodiversity, connectivity and infrastructure.
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- Latest position – Following on from Scoping & Call for Sites consultation last year, have published results at www.southwarwickshire.org.uk/swlp and working up Issues & Options version. Stakeholder workshops planned for July to help devise spatial strategy.

Local Plan Update

SDC Local Plans

- Site Allocations Plan
 - Revised Preferred Options approval on 23rd May and then consultation early summer
 - Continue to address Birmingham & BC HMA shortfall through reserve sites
 - Reserve site at Meon Vale and identification of Long Marston Rail Innovation Centre

WDC Local Plans

- Net Zero Carbon DPD – Reg19 consultation

South Worcestershire Development Plan

- SWDP to meet Worcester's needs
- Rail-based new settlement strategy (Throckmorton, Worcester Parkway, Rushwick + new station, Mitton)
- Publication of SWDP November and December 2022 but need to clarify timetable following publication. New LDS on submission next year.
- G&T DPD also in preparation

Strategic Cross-Boundary Issues

- LMA Garden Village and Meon Vale – potential for cross boundary infrastructure, active travel and green infrastructure
- Vale of Evesham Control Zone
- Stratford and Wychavon in different housing markets so no significant cross boundary issues

Other Issues

Gypsies & Travellers

- SWDP meeting only needs including windfall
- SDC & WDC doing GTAA for SWLP – looking to meet own needs

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Evolving the Spatial Growth Options – the story so far

Topic Paper – Issues and Options

August 2022



Contents

1.0 Introduction

2.0 Consultation feedback – what you said

3.0 Meetings with stakeholders

4.0 Evidence gathering

5.0 Stakeholder workshops – how much where?

6.0 Conclusions

7.0 Next steps

1.0 Introduction

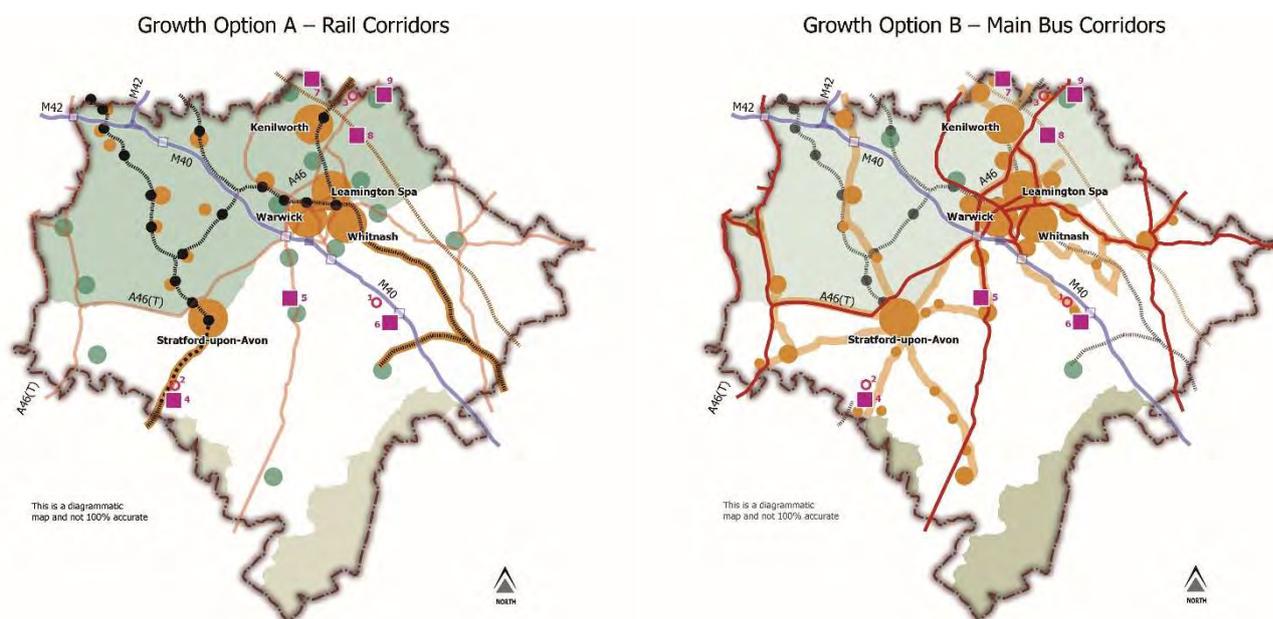
Purpose of this document

1.1 The [Scoping Consultation document](#) published in May 2021 identified seven high-level growth option scenarios (p71-87). Each of these growth options (A-G) explored how they had the potential to result in different growth distribution, and feedback was invited on these as part of the Scoping Consultation. In addition, the Scoping Consultation document identified additional ‘options’ for any emerging spatial strategy (i.e. they could apply to any and all of the spatial scenarios identified in A-G), including opportunities for densification, and new settlements.

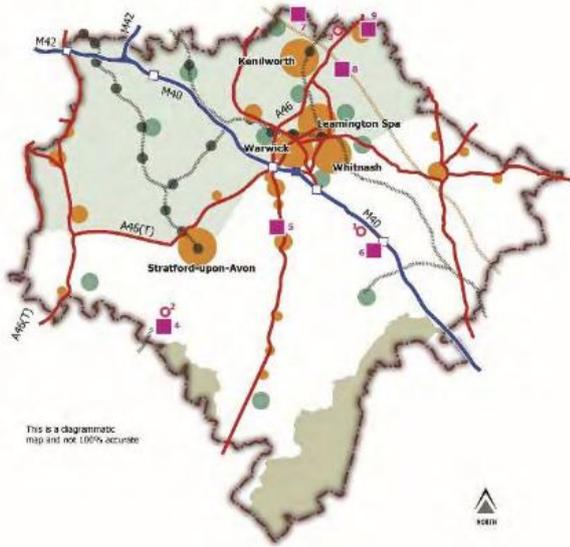
1.2 This document will set out how these 7 high-level spatial growth options have been considered, and how they have evolved to result in the 5 spatial growth options identified within the Issues and Options consultation document. It is intended that setting out the methods and processes that have been employed to evolve the spatial growth strategy options to date, will improve general understanding and enable more informed feedback on the spatial strategy options within the Issues and Options Consultation document.

The starting point

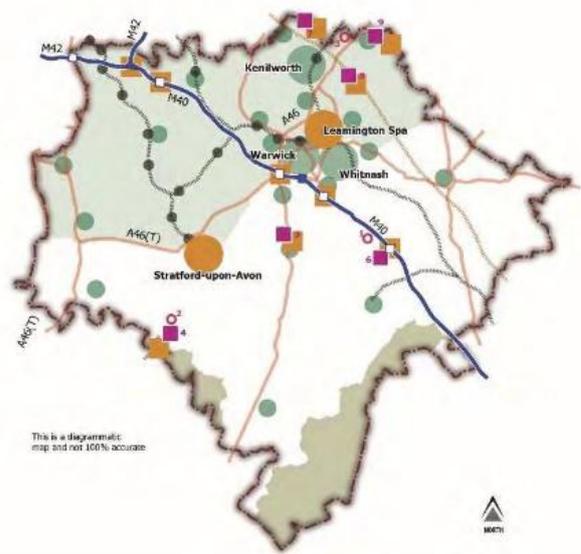
1.3 As set out above, the Scoping Consultation document identified 7 high-level growth options:



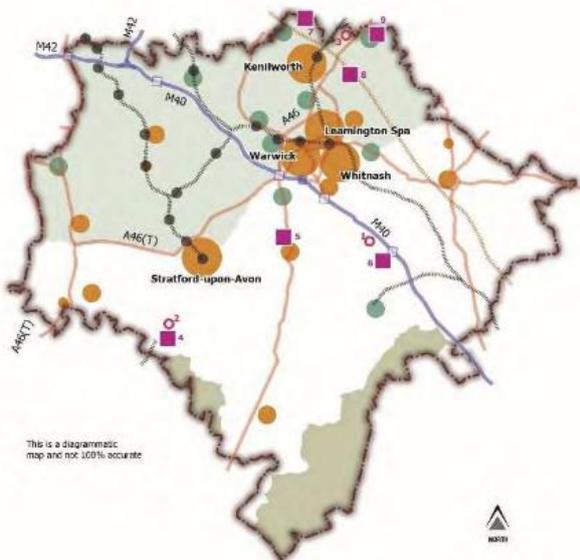
Growth Option C – Main Road Corridors



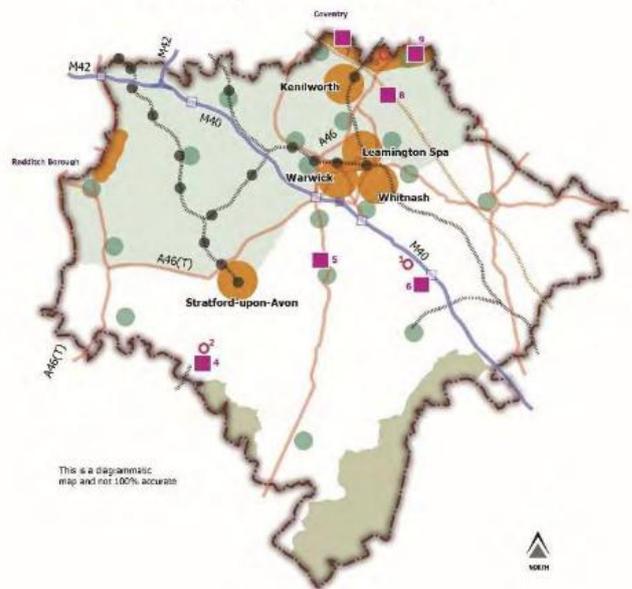
Growth Option D – Enterprise Hubs



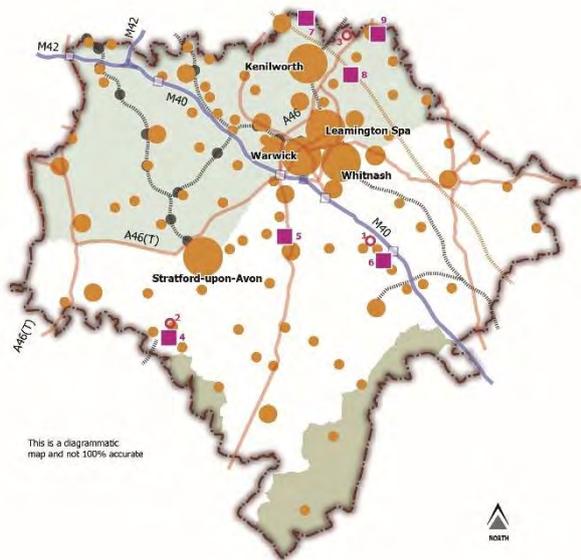
Growth Option E – Socio Economic



Growth Option F – Main Urban Areas



Growth Option G – Dispersed

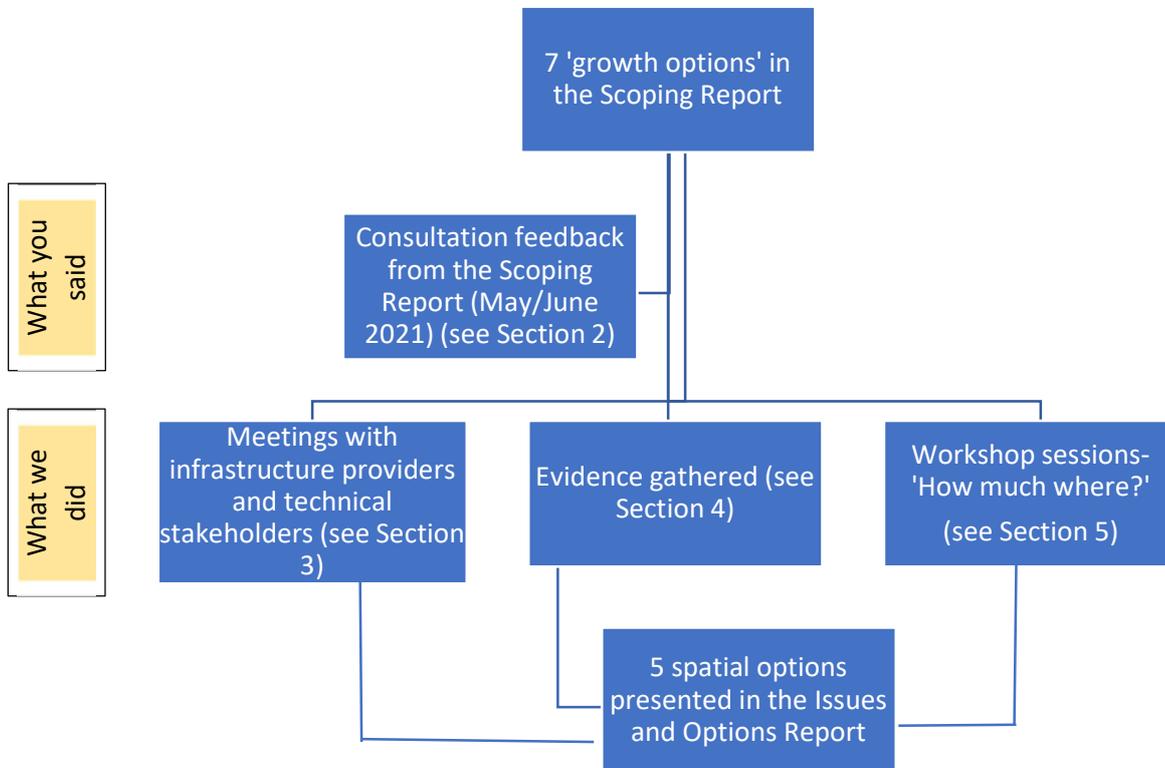


Each of these 7 spatial growth options, was considered in a high-level climate change analysis, and Sustainability Scoping, as well as being subject to feedback from the Scoping consultation. Each of these elements, plus further subsequent work and evidence forms part of how these options have evolved into the 5 included in the Issues and Options consultation.

Overall route-map

1.4 Figure 1 overleaf, sets out the key elements of the process which have evolved the original 7 'growth options' outlined above, to the 5 options set out in the 'Issues and Options' report. Each of the elements within the process will be examined in further detail within this paper.

Figure 1 – Route map to the 5 spatial options

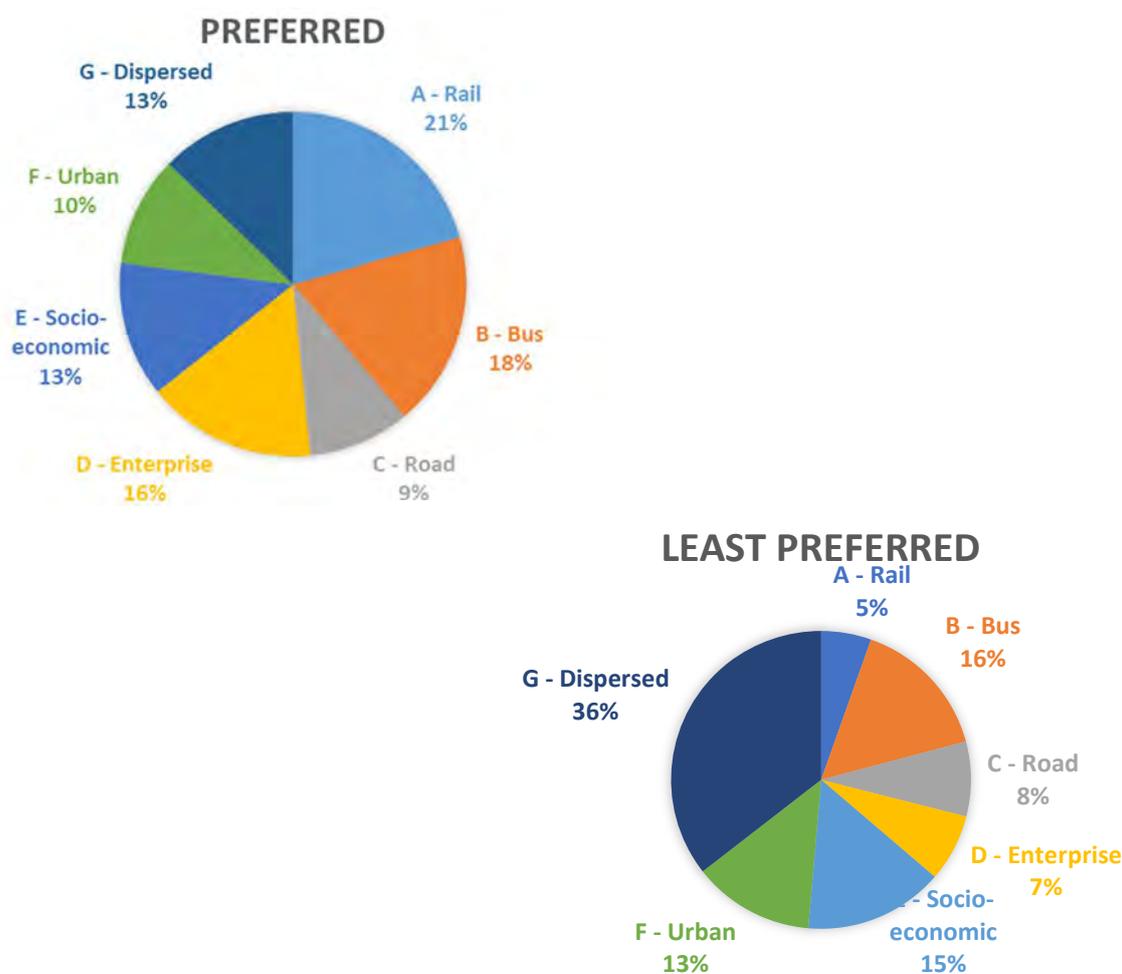


2.0 Consultation feedback - What you said

2.1 Feedback received in respect of all elements of the Scoping consultation is summarised in detail in the '[Consultation Statement](#)', January 2022. Information from the Consultation Statement will not be repeated here, however key statistics and key points pertinent to the evolution of the spatial growth options are summarised below.

2.2 As the charts below demonstrate, there was no overwhelming preferred growth option of the 7 presented in the Scoping document. Commentary in representations emphasised a desire/need for the climate agenda and general sustainability to be at the heart of any emerging spatial option. Approximately 100 respondents cited a preference for a combination of some or all of the options (i.e. a hybrid), suggesting that this was most likely to achieve climate and sustainability objectives in practice (see page 234 of the Consultation Statement – responses to Qu 48: What is your favourite Growth Option, and what do you particularly like about it?).

Figure 2. Preferred and least preferred options from Scoping feedback



2.3 At Scoping stage, a [high-level climate change analysis](#) of the 7 growth options was undertaken, to which feedback was invited under question 47 (see page 228 of the Consultation Statement). There was a general sense amongst the feedback that the level of detail on the options was insufficient to draw clear conclusions at that stage, and that could risk premature discarding of options. Specific suggestions in representations included:

- A workshop type approach where key stakeholders can engage and influence the process outside the formal consultation process (See 'Section 5 – Stakeholder Workshops – How much where?').
- Independent climate change experts should be appointed to robustly test options (See Section 4 – Evidence gathering)

What we have done with your feedback

2.4 As illustrated by Figure 1, feedback received to the Scoping Consultation in 2021 has directly influenced the next steps in respect of evolving the spatial options further. This will be examined further in sections 3-5 of this document, where the '*what we did*' elements of the process are set out.

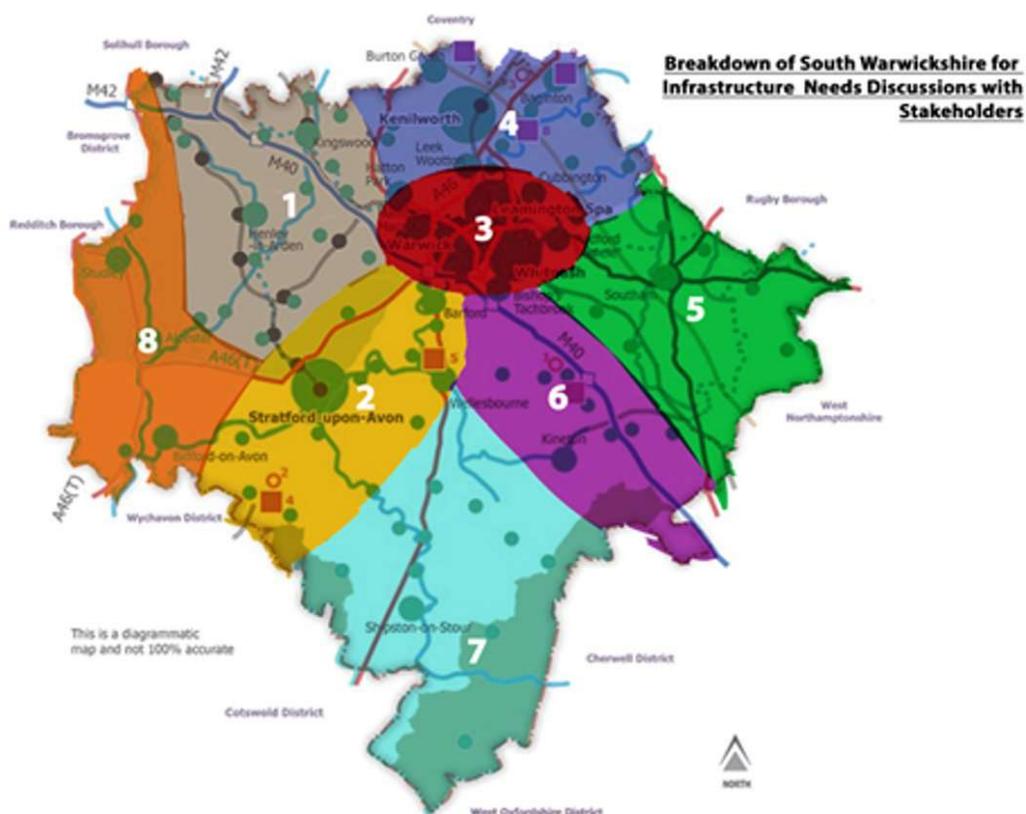
3.0 Meetings with stakeholders

3.1 Officers met with a range of infrastructure providers and technical stakeholders with the specific objective of exploring existing infrastructure capacity (or lack thereof). This included, for example representatives of organisations such as the Local Education Authority, the NHS, Public Health, Severn Trent Water, Utilities Companies and Transport Authorities, amongst many others. A full list is set out in appendix 1. This dialogue will continue throughout the plan-making process.

3.2 The objective of these meetings was to explore where opportunities and constraints exist across different functional areas of South Warwickshire with regard to infrastructure capacity, potential infrastructure provision or potential upgrade.

3.3 In most instances, the focus of the stakeholder meetings was to examine the spatial implications of the content of representations made to the Scoping Consultation. All representations to the consultation are available [here](#). The map below in figure 3, was used to inform conversations and frame discussions around areas across South Warwickshire. The map divides the area into perceived functional relationships to aid discussion, but has no wider purpose or weight.

Figure 3. – Map used to inform infrastructure needs discussions



3.4 The outputs and discussions of the individual meetings have informed the evolution of the spatial options (and policy options) set out within the 'Issues and Options' paper. Further input from all stakeholders is anticipated throughout the plan process, including, but not restricted to formal consultation processes, such as the 'Issues and Options' consultation.

4.0 Evidence gathering

4.1 Evidence to assist with various aspects of plan-making, including evolving spatial strategy options has been identified and either undertaken directly by officers, or commissioned from external consultants. The table below identifies the key pieces of evidence which have been undertaken to date. In some instances (see appendix 2) the evidence has already contributed to the development of the spatial options (e.g. Bus Accessibility Mapping). In other cases, evidence reviews the 5 spatial options (e.g. Climate Change: Estimation of emissions from proposed growth options and new settlements, and Sustainability Appraisal) and the findings of this evidence will be reflected upon fully post consultation. All of the evidence gathered to date, and that which will be developed further through the plan-making process, will continue to influence the evolution of the spatial strategy and the policies for the SWLP.

Table 1: Issues and Options Evidence Base

Title	Purpose	Scope	In-house / Consultant
Bus Accessibility Mapping	To demonstrate the areas of South Warwickshire best served by bus routes to different types of destinations. Conversely to examine 'gaps' in bus services. This is primarily aimed at examining the 'Main Bus Route' growth option identified in the Scoping Consultation.	A heat map approach examining existing bus provision, and future committed bus services (i.e. funded services for example secured through S106)	Consultant
Climate Change Baseline Report	To consider the baseline conditions	To consider the baseline conditions	Consultant
Climate Change: Estimation of emissions from proposed growth options and new settlements	An assessment to determine the impact of development on climate change.	This work will be ongoing throughout the plan-making process. At this stage it undertakes a high-level assessment of the emerging 5 spatial strategy options, and the policy options in the Issues and Options.	Consultant
Equalities Impact Assessment (EIA)	An assessment to ensure equal opportunities have been taken into account in all decision making.	This work will be ongoing throughout the plan-making process.	In-house
Gypsy and Travellers Accommodation Assessment	An assessment to determine the need across the South Warwickshire Area which will inform the Local Plan.	Identify need for accommodation for Gypsies, Travellers and Travelling Show people, including the type of accommodation.	Consultant
Habitats Regulations	An assessment to determine the potential effects of the Plan on protected habitats.	This work will be ongoing through the plan-making process.	Consultant

Title	Purpose	Scope	In-house / Consultant
Assessment (HRA)			
Heritage Assessments	To ensure that heritage opportunities and constraints are considered in developing spatial options and wider policy considerations.	Desktop review of existing heritage assets.	Consultant
Housing & Economic Development Needs Assessment (HEDNA) – Covering Coventry and Warwickshire	To outline (independently) what the need for housing and economic growth requirements across South Warwickshire are, based on robust evidence.	This takes into account a wealth of evidence such as population, household and economic growth projections in order to assess the need for housing and employment over a period of time. The HEDNA has taken account of the data from the census in 2021.	Consultant
Settlement Design Analysis	An analysis that looks at the structure and design of existing settlements to help identify where growth might be best integrated.	The study examines the street pattern of the settlement, any physical barriers to movement which exist, local infrastructure provision, and density ranges.	In-house
Strategic Environmental Assessment / Sustainability Appraisal (SA/SEA)	This is an assessment of the significant environmental, social and economic effects of the Local Plan.	This work will be ongoing throughout the plan making process. At this stage, it does look specifically at the emerging options.	Consultant
Strategic Flood Risk Assessment (SFRA) – Part 1	An assessment which looks at all known sources of flooding that could affect existing or future development in an area.	Reflect flood risk from all sources.	Consultant
Urban Capacity Study	To provide an analysis of the potential urban capacity of South Warwickshire on previously developed land in the existing built-up areas. The capacity of the existing urban areas will give an indication of how much of the growth may be accommodated without the need to utilise greenfield land.	To give an indication of the potential urban housing capacity across 23 settlements in South Warwickshire. This will be subject to the application of policy and the conclusions of more detailed subsequent work as part of the South Warwickshire Local Plan process. The Urban Capacity Study has been done as a theoretical exercise only and is not intended to conclusively establish the	Consultant

Title	Purpose	Scope	In-house / Consultant
		urban capacity of South Warwickshire up to 2050.	

4.4 The developing evidence base notably includes independent climate change analysis of the draft spatial options. This responds to some specific feedback received to the Scoping Consultation as outlined in paragraph 2.3 above. This piece of evidence, alongside many others identified in the above table, will continue to be developed in further detail as the options are further refined, and a preferred option emerges. All of the above, and further anticipated evidence (see Section 7: Next Steps) will inform all subsequent stages of the plan-making process.

5.0 Stakeholder Workshops – ‘How much where?’

5.1 In June and July 2022, a total of 11 workshops were arranged to enable a different stakeholders to engage informally with ideas and options about how growth might be distributed across South Warwickshire. These workshops respond directly to feedback from the Scoping stage (as set out in para 2.3), and whilst designed as informal dialogue, participants were aware that the group outcomes across all these sessions would inform the ‘Issues and Options’ stage.

This section will outline the purpose, attendance and nature of the workshops, and highlight the key themes and outcomes.

Purpose

5.2 The purpose of the workshops was to allow relatively informal discussion of potential strategies for distributing growth across South Warwickshire. This was designed to raise awareness of the challenge, seek new ideas, examine areas of consensus, and discuss potential climate implications. The attendees were reminded of ideas suggested in the Scoping Consultation (i.e. the 7 growth options at outlined earlier in this document), but were able to explore a range of ideas within small groups ranging between 6-10 participants. Each workshop session had either 2 or 3 groups depending on the level of attendance.

Attendance

5.3 A range of stakeholders were invited to attend different workshop sessions. Given the anticipated range of perspectives across the stakeholder invitees, session invitations were targeted at different audiences as identified below. Workshops were held in person, either in the Council Chamber at Elizabeth House in Stratford-upon-Avon, or the Council Chamber in the Town Hall in Leamington Spa.

Table 2: External Stakeholder Workshop Sessions

Group type	Date	Time	Location
Stakeholders*	6 July 2022	Morning	Elizabeth House, Stratford-upon-Avon
	7 July 2022	Evening	Town Hall, Leamington Spa
	14 July 2022	Afternoon	Elizabeth House, Stratford-upon-Avon
Land interests**	13 July 2022	Evening	Elizabeth House, Stratford-upon-Avon
	15 July 2022	Morning	Town Hall, Leamington Spa

*Stakeholders – this group of invitees included technical stakeholders and local interest groups such as those identified in appendix 1, and town and parish council representatives.

**Land interests – this group of invitees included landowners and agents who have made representations and/or submitted land under the ‘call for sites’

5.4 In addition to the above workshop sessions with external stakeholders, the same workshop exercise was run with officers from both SDC, WDC and Warwickshire County Council (x1), and Members from both SDC and WDC collectively (x2), the SWLP Advisory Group (a group of Members from both Councils who advise officers) (x1) and the Cabinets and senior management teams of both Authorities (x2).

The exercise

5.5 The premise of the workshop exercise was for each group to create two spatial strategies:

- One strategy where the green belt could not be developed in any way (green belt 'on') – approximately 30 minutes
- One strategy where development could be placed in the green belt (green belt 'off') – approximately 30 minutes

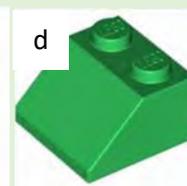
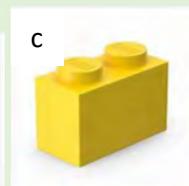
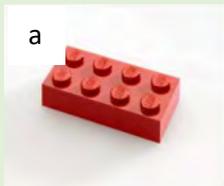
5.6 The two different scenarios acknowledge the fact (as highlighted at Scoping stage) that many of the 7 'growth options' indicate potential growth in the green belt. Green belt is however a strong national policy designation, and any incursion would require thorough examination and robust justification. It remains to be determined whether the SWLP might seek some green belt revisions, and this matter will be explored further through the 'Issues and Options consultation'.

5.7 A short presentation was given at the beginning of each workshop session. This set out the context of the session, including a recap of the key information from the Scoping stage, ongoing evidence gathering to inform the SWLP, and the arrangements, rules and assumptions on which the exercises were designed, as set out below. The distribution of growth within these strategies was recorded at the conclusion of each exercise.

Tools

Each group were provided the following equipment in the workshop:

- A large Ordnance Survey base map depicting the entirety of South Warwickshire and its boundary. The map included the extent of the green belt, the Cotswold National Landscape (Area of Outstanding Natural Beauty), existing local plan allocations, and some findings for the Settlement Design Analysis work.
- Small plastic building bricks (similar to Lego) – the bricks represented varying numbers of homes and areas of employment land (see below).



- a) 200 homes
- b) 100 homes
- c) 50 homes
- d) 30ha employment

- Sticky notes and pens – to record any infrastructure requirements/assumptions or other points of note to the strategy
- A facilitator.

Rules

Each group was given the same set of rules

- 1) Groups must use all bricks
- 2) Groups must place all bricks within the South Warwickshire Boundary
- 3) Groups cannot place all bricks in one location, though otherwise completely up to them
- 4) Groups to take a simple vote where there is disagreement
- 5) No writing on the map
- 6) No pinching the bricks!

Assumptions

Each group were asked to make the following assumptions in devising their strategies:

- 35,000 homes and 330ha of employment land (bricks provided equated exactly to these figures)
- Figures assumed exclude existing local plan allocations which may be carried forward (subject to confirmation)
- Figures assumed exclude any potential shortfall from Birmingham or Coventry
- Figures exclude urban capacity (the Urban Capacity was under preparation at the time of the workshops but not complete)
- In general terms, assume existing infrastructure is at capacity

Thresholds

All groups were given the following high-level infrastructure thresholds to consider when devising their strategies:

- Primary school – approximately 1,000 – 2,000 homes
- Secondary school – approximately 4,000 – 5,000 homes
- Railway station – approximately 6,000 homes

Workshops in progress



A workshop in progress at Elizabeth House



A workshop in progress at the Town Hall



An example of the workshop output

Summary of key workshop findings

- All groups revised their strategy when placements were permitted in Green Belt locations. This is a clear indication that placing all the growth outside of the Green Belt was not felt to be the most suitable growth strategy.
- The Green Belt location most consistently taking growth of housing and employment land was Henley-in-Arden. The second most popular Green Belt location was Kenilworth.
- The main towns were regularly selected for further growth – including the Warwick, Leamington Spa and Whitnash conurbation, and Stratford-upon-Avon.
- The existing new settlements of Gaydon / Lighthorne Heath and Long Marston Airfield were frequently selected for significant further growth in both housing and employment land, beyond what is currently allocated.
- Shipston-on-Stour, Southam, Bidford-on-Avon, Wellesbourne and Kineton were all regularly suggested for further growth. When Green Belt alternatives were permitted, Bidford-on-Avon and Kineton were chosen less frequently.
- Many delegates were open to the idea of further new settlements. No single location was identified as being the most suitable, but there was a preference for locations on existing rail lines.
- Dispersal of growth in smaller placements accounted for a relatively small proportion of housing growth.

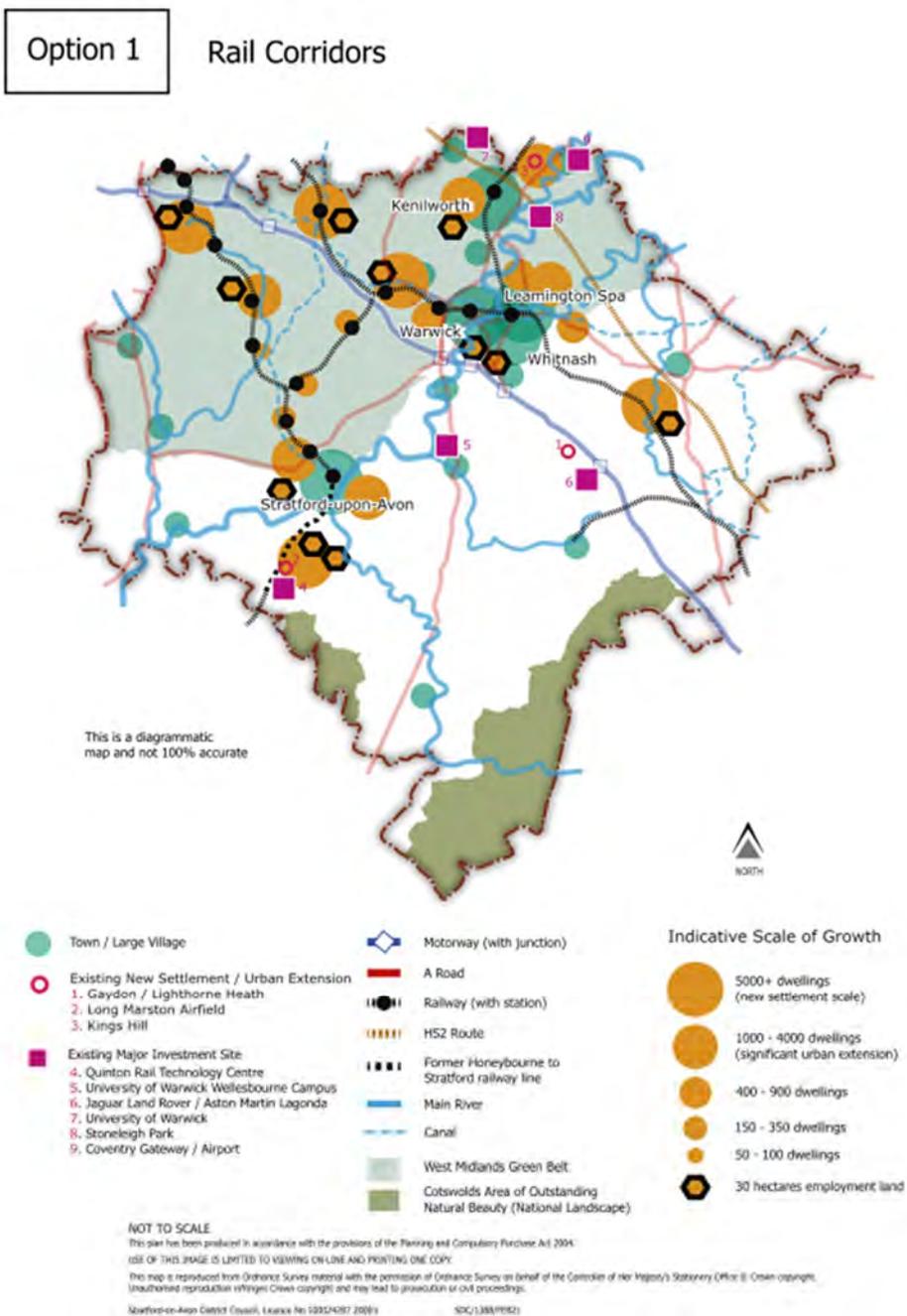
A separate report summarising the outcomes of the workshop sessions has also been published.

6.0 How 'what you said' and 'what we did' have evolved the spatial growth options

6.1 The tables in appendix 2 sets out each of the original 7 growth options from the Scoping Report, and summarises how each element within this paper ('what you said', and 'what we did') has contributed to a conclusion about whether to further explore the option; discard the option; or use the option in combination with at least one other.

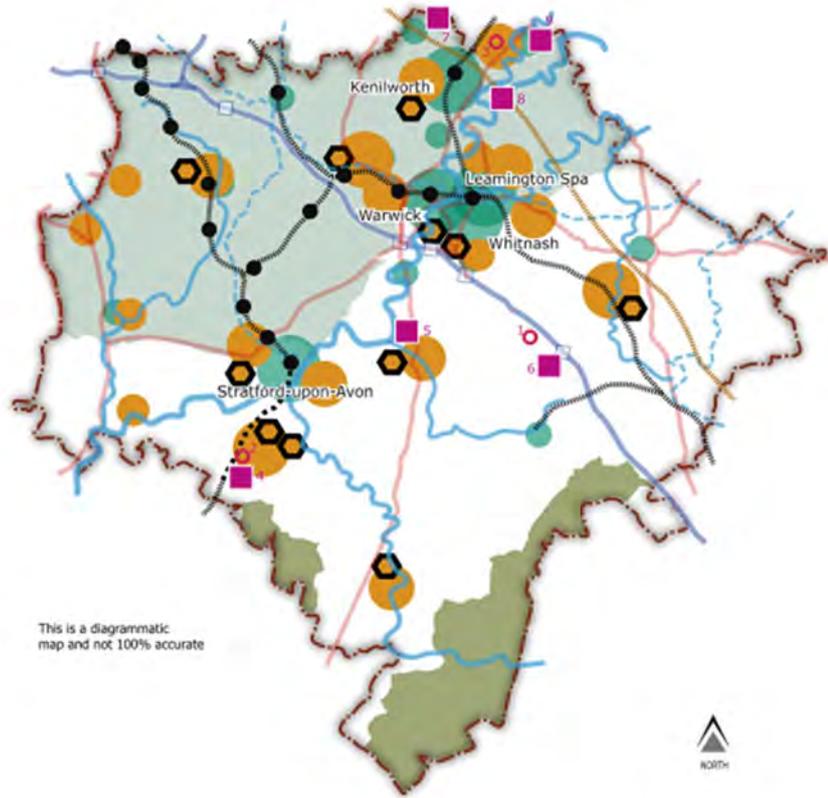
6.2 The result is that 5 spatial options are included in the Issues and Options consultation paper for further feedback:

1- Rail corridors – retained option from the Scoping Document



2 – Sustainable Travel – a hybrid of the ‘rail corridors’ and ‘main bus routes’ options

Option 2 Sustainable Travel
(Hybrid of rail and main bus corridors)



This is a diagrammatic map and not 100% accurate

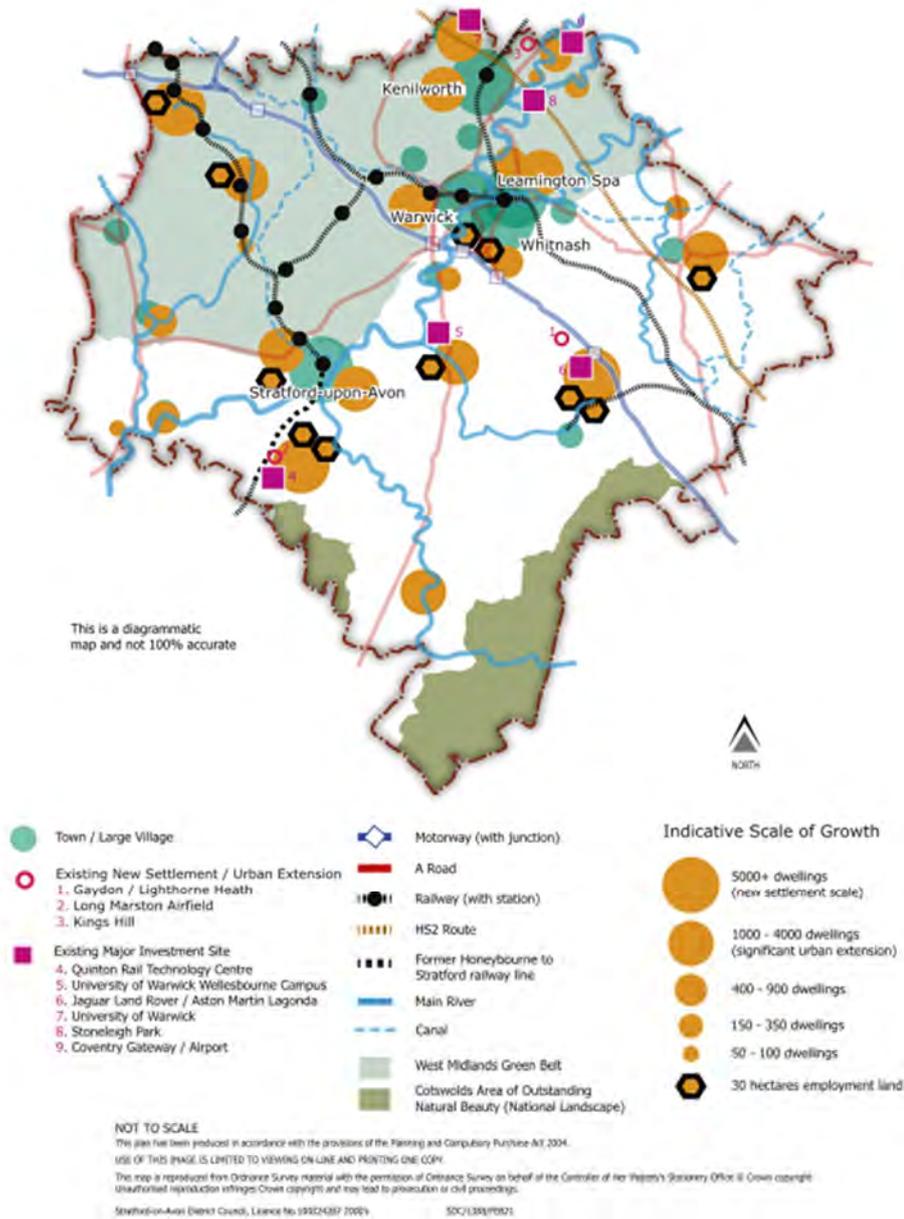
- | | | | | | |
|--|--|--|---|-----------------------------------|---|
| | Town / Large Village | | Motorway (with junction) | Indicative Scale of Growth | |
| | Existing New Settlement / Urban Extension | | A Road | | 5000+ dwellings (new settlement scale) |
| | 1. Gaydon / Lighthorne Heath | | Railway (with station) | | 1000 - 4000 dwellings (significant urban extension) |
| | 2. Long Marston Airfield | | HS2 Route | | 400 - 900 dwellings |
| | 3. Kings Hill | | Former Honeybourne to Stratford railway line | | 150 - 350 dwellings |
| | Existing Major Investment Site | | Main River | | 50 - 100 dwellings |
| | 4. Quinton Rail Technology Centre | | Canal | | 30 hectares employment land |
| | 5. University of Warwick Wellesbourne Campus | | West Midlands Green Belt | | |
| | 6. Jaguar Land Rover / Aston Martin Lagonda | | Cotswolds Area of Outstanding Natural Beauty (National Landscape) | | |
| | 7. University of Warwick | | | | |
| | 8. Stoneleigh Park | | | | |
| | 9. Coventry Gateway / Airport | | | | |

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3 - Economic – a hybrid of elements of the ‘Enterprise’ and ‘socio-economic’ options

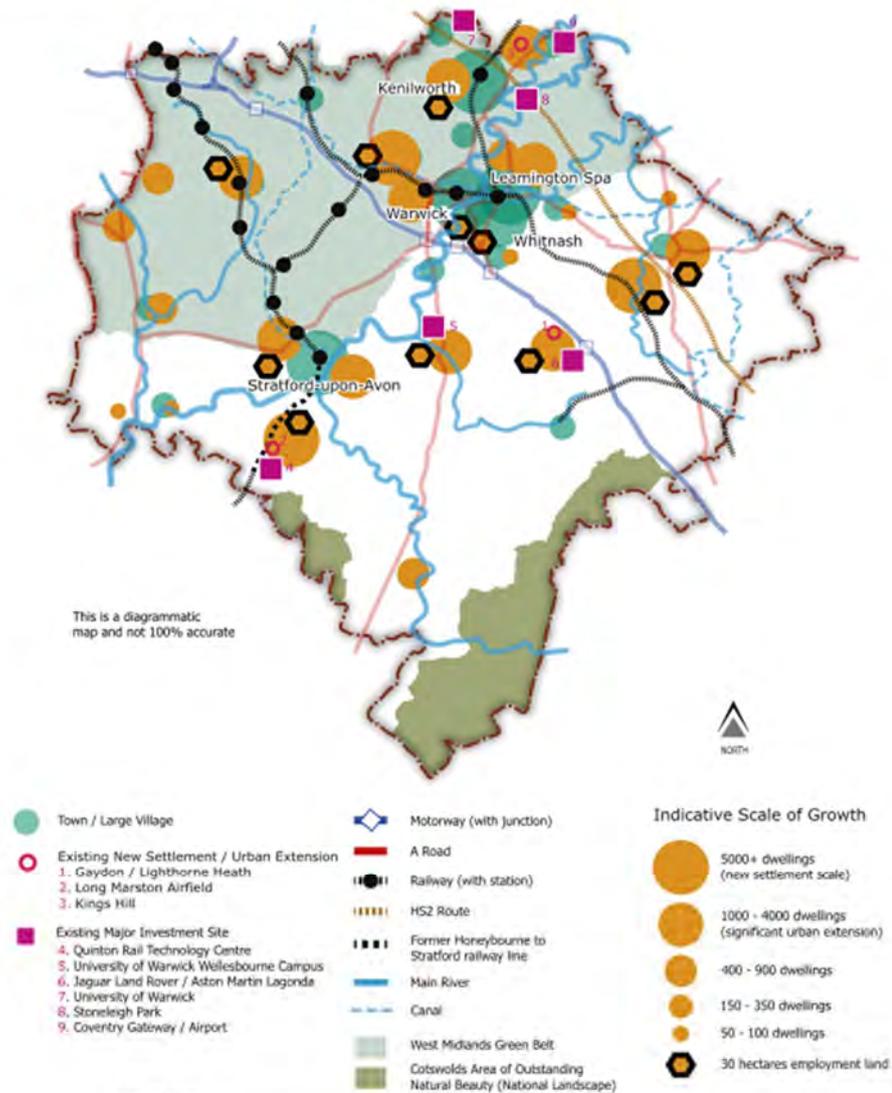
Option 3

Economy
(Hybrid of socio-economic and enterprise hubs)



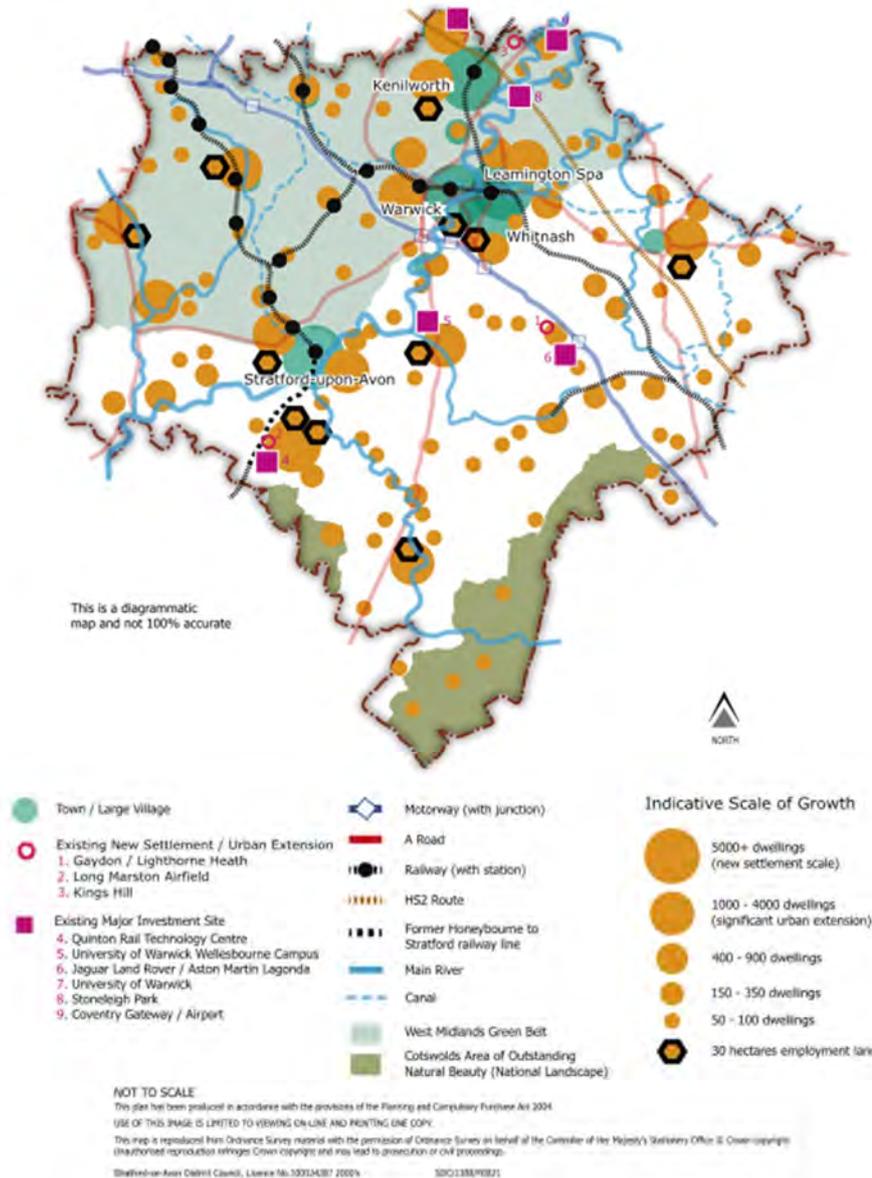
4 – Sustainable Travel and Economy – a hybrid of all the above options

Option 4 Sustainable Travel and Economy
(Hybrid of Options 2 and 3)



5 – Dispersed – retained option from the Scoping Document

Option 5 Dispersed



6.3 Each of the 5 spatial options may include potential new settlements, and consider densification of existing settlements (see Urban Capacity Study) as appropriate. The Issues and Options paper includes further consideration of these matters and potential options, alongside the relevant evidence gathered to date.

7.0 Next steps

7.1 The Issues and Options Consultation is a relatively early stage of the plan-making process (see [timetable](#)). The feedback we receive in response to this 'Issues and Options' consultation, alongside the analysis in evidence documents in table 2 (for example the climate change analysis of the 5 options amongst others), and further evidence yet to be commissioned, will help guide us toward selecting a preferred spatial strategy. This 'Preferred Option' will form a subsequent formal stage of consultation.

7.2 With regard to the spatial strategy specifically, a key next step will be to examine the amount of suitable and available land which may contribute to the achievement of strategy options. This is necessary to ensure that any strategy is likely to be deliverable. Alongside the Issues and Options consultation, another 'Call for Sites' is being run, to attract further land/site identification (in addition to those already submitted at Scoping stage), in order that we can review this comprehensively. These sites can be submitted for a range of different uses which could contribute to the objectives of the SWLP.

7.3 The sites submitted, alongside any other known sites, will be subject to assessment under the Housing and Economic Land Availability Assessment (HELAA). This will help us to assess whether each spatial strategy option is potentially deliverable.

7.4 There is a range of further studies and evidence that we know we will need to gather, to build upon the suite already outlined in Section 4, and in some cases continue to develop the detail of some studies. Examples are listed below in *Table 3*, though this is not an exhaustive list. The outcomes of the Issues and Options stage of consultation may also necessitate further investigations and studies to inform particular issues. An example of this would be a potential green belt review if there is evidence to suggest that this may be necessary in the context of spatial options.

Table 3 – future evidence base examples

Title	Purpose	In-house / Consultant
Air Quality Assessment	An assessment to look at the air quality impacts of proposals in the SWLP on Air Quality Management Areas.	Consultant
Biodiversity & Green Infrastructure Assessment	An assessment that will help guide and shape the planning and delivery of biodiversity and Green Infrastructure.	Consultant/In-house
Climate Change Impact Assessment	Ongoing assessment to determine the impact of development on climate change.	Consultant
Equalities Impact Assessment (EIA)	Ongoing assessment to ensure equal opportunities have been taken into account in all decision making.	In-house
Green Belt Study	A review which provides evidence of how areas perform against the Green Belt purposes set out in National Policy. This can be used alongside other	Consultant

Title	Purpose	In-house / Consultant
	evidence when looking at potential changes to the Green Belt. (See above para 7.4)	
Habitats Regulations Assessment (HRA)	Ongoing assessment to determine the potential effects of the Plan on protected habitats.	Consultant
Health Impact Assessment (HIA)	Ongoing use of a tool to identify and optimise the health and wellbeing impacts of planning.	Both
Heritage Assessment	Further detailed heritage assessments in the context of a preferred option	Consultant
Infrastructure Delivery Plan	This will set out the strategic infrastructure requirements in order to deliver growth planned for within the Local Plan.	Both
Landscape Character Assessment	An assessment undertaken to help identify various landscape types with a distinct character that is based on a recognisable pattern of elements, including combinations of geology, landform, soils, vegetation, land use and human settlement.	Consultant
Playing Pitch Strategy	To assess the need for playing pitches across South Warwickshire in quantitative and qualitative terms.	Consultant
Site Delivery & Viability Studies	An assessment to ensure that sites critical to delivering the strategic priorities of the Plan are deliverable and viable.	Consultant
Strategic Environmental Assessment / Sustainability Appraisal (SA/SEA)	Ongoing assessment of the significant environmental, social and economic effects of the Local Plan.	Consultant
Housing and Economic Land Availability Assessment (HELAA)	A high level assessment which considers the quantity and quality of sites that could be developed for housing, employment or other uses.	In-house
Strategic Flood Risk Assessment (SFRA) Part 2	To examine the flood risk associated with siting development in particular locations.	Consultant
Town Centre Studies	An assessment of retail needs and how much will need to be planned for over the plan period.	Consultant
Transport Assessment	This will set out the transport issues in relation to development and identify measures that can deal with the impacts of schemes in relation to all modes of travel.	Consultant

Title	Purpose	In-house / Consultant
Water Cycle Study	This assesses the constraints and demands future development will place on existing water services infrastructure including waste and supply.	Consultant

Appendix 1

Stakeholder Organisations

Organisation (s)	Topic Area (s)
Warwickshire County Council – Education Services	Education Infrastructure
Severn Trent Water	Water Infrastructure
Environment Agency	Water and Flooding
Warwickshire Wildlife Trust	Biodiversity and Ecology
Warwickshire County Council – Environmental and Ecology Services	Environment, ecology, biodiversity and Green Infrastructure
Natural England	Environment and Green Infrastructure
Cotswolds AONB Board	Cotswolds AONB
Warwickshire County Council – Public Health	Health and Wellbeing
CCG/Ambulance Trust/Foundation Trust (SWFT)	Health and Wellbeing
Cadent Gas	Energy Infrastructure
Western Power Distribution	Energy Infrastructure
Open Reach	Digital Communications
Mobile UK	Digital Communications
Warwickshire County Council Highways/National Highways/Transport West Midlands/West Midlands Rail Executive	Transport Infrastructure
Warwickshire County Council – Minerals and Waste	Minerals and Waste
Historic England	Heritage
C&WLEP and Economic Development officers at SDC and WDC	Economy
Stratford and Leamington BIDS	Town Centres
Shakespeare’s England	Tourism
Homes England/Registered Providers	Housing

Appendix 2 – summary of findings and proposed way forward for each of the 7 original growth options

Growth Option	A - Rail
Consultation feedback: Most preferred option	21% (most preferred single option)
Consultation feedback: Least preferred option	5%
SWLP Team Officer testing	Spatially, there appears to be capacity, albeit with implications for the green belt
Stakeholder input (either written or during meetings)	Business cases for new rail stations are complex. Sufficient critical mass of population is one element, but where those people want to travel and why, also form a significant part of the picture. If the rail line does not facilitate the trips that meet the population’s needs/wants, making the case can become more difficult.
Additional evidence acquired	N/A
Workshop findings – how much where?	Rail corridors were commonly considered amongst groups in determining their strategies. This often most clearly manifested in the placement of new settlements, particularly in ‘green belt policy on’ scenarios on account of most settlements originally identified in this option being wholly or partially enveloped by green belt (only 3 of the 14 settlements were utilised in the green belt on option compared with 8 of the 14 commonly utilised with green belt off.
Officer conclusions	There may be potential to develop a spatial strategy based solely on rail further. However, as set out below, it is suggested that a ‘sustainable travel’ (hybrid) based spatial strategy may bring additional benefits, and links in with Scoping Consultation feedback which suggested that options A and B (along with D) were most commonly suggested to be combined with others (see p 235 of the Consultation Summary).
Proposed way forward	Continue to explore this option. Also test a hybrid ‘rail and bus’ (sustainable travel) spatial option – see below. This need not be restricted to rail and bus, but could also encompass other travel corridors (e.g. canals) or travel hubs.

Growth Option	B - Bus
Consultation feedback: Most preferred option	18%
Consultation feedback: Least preferred option	16%
SWLP Team Officer testing	Spatially, there appears to be capacity. Potential implications for the green belt.
Stakeholder input (either written or during meetings)	Growth could potentially support and enhance existing routes – e.g. extend existing routes or increase frequency to make the route more attractive. Alternatively, substantial areas of growth might enable new or much expanded routes.
Additional evidence acquired	Bus accessibility maps
Workshop findings – how much where?	Of the 32 settlements identified within this option, less than 50% of them frequently featured in strategies irrespective of the green belt. From a facilitator perspective bus was not regularly discussed, though sustainable travel and rail particularly was. Bus routes are not however identifiable on the OS base map, where rail stations are, so this may have affected the result.
Officer conclusions	Generally positive responses for growth to support sustainable travel, but opinion on the bus option in isolation is finely balanced. This option was one of the ones most commonly suggested for a hybrid solution (along with options A and D). Taking a more holistic view of sustainable travel in evolving a spatial strategy is concluded as a logical route forward.
Proposed way forward	Hybrid ‘rail and bus’ spatial option (sustainable travel), aiming to focus strategic growth to support existing sustainable transport provision and potentially expand the services where appropriate. A further ‘super-hybrid’ also forms one of the emerging spatial options, encompassing sustainable travel and economy see ‘new option’ below.

Growth Option	C- Road
Consultation feedback: Most preferred option	9% (lowest preferred option)
Consultation feedback: Least preferred option	8%
SWLP Team Officer testing	Spatially there appears to be capacity
Stakeholder input (either written or during meetings)	In terms of travel, the user hierarchy should be applied which places travel by private car at the bottom. Utilising this approach aims to 'free up' as much capacity as possible within the road network, and therefore reduce the amount of extra capacity that may need to be accommodated as a result of growth.
Additional evidence acquired	N/A
Workshop findings – how much where?	<p>Of the settlements with growth most commonly identified across all groups, approximately 50% of settlements identified for strategic road access were identified irrespective of green belt on or off (though the selection of which settlements selected varied between exercises).</p> <p>Within the group discussions the placement of new settlements often referenced proximity to road junctions, though rarely in isolation from other connections, most notably rail.</p>
Officer conclusions	<p>This option was the least popular in the consultation feedback. It does not fit with the user hierarchy and is considered dichotomous with the climate related objectives of the plan.</p> <p>Whilst it is an accepted that private cars will remain as a travel mode of choice, and accommodation for such will need to be incorporated into the plan, given the overarching principles already established, it is concluded as inappropriate to further develop a spatial strategy founded purely on access to the strategic road network.</p>
Proposed way forward	This option will not be developed further at this stage.

Growth Option	D - Enterprise
Consultation feedback: Most preferred option	16%
Consultation feedback: Least preferred option	7%
SWLP Team Officer testing	Officers found it challenging to accommodate development need in the locations defined within this option. There was some debate about whether housing development could/should reasonably be accommodated in some of the defined locations, or whether it could/should be around the nearest settlements. Some of these settlements are relatively small in size, and access to infrastructure an issue.
Stakeholder input (either written or during meetings)	N/A
Additional evidence acquired	N/A
Workshop findings – how much where?	<p>In developing their strategies, groups tended to refer to growth at existing settlements or locating a new settlement. Many of the places defined within the option at Scoping stage (e.g. motorway junctions) were not explicitly part of the narrative in respect of housing, though some did feature frequently as employment locations.</p> <p>Locations/settlements close to some of the places listed under this option are also in evidence in some of the group strategies. For example, the main urban areas, land around Long Marston, and around Gaydon amongst others.</p> <p>It was a notable trend that groups tended to co-locate employment land with substantial housing growth in their strategies.</p>
Officer conclusions	<p>This option places ostensibly more emphasis on economic development than some others. It is largely road focussed in-terms of the identified potential growth locations, but the results of responses from the Scoping consultation suggests the economic emphasis is sufficient to make this more palatable than the road option (C), albeit that concerns regarding the appropriateness of some locations for housing is questioned, by reason of lack of accessible and necessary infrastructure. Consultation feedback also indicates that this option is one of the three most favoured options when combined in a hybrid scenario (see p235 of the Consultation Summary)</p> <p>Officers have found indicative challenges in spatially accommodating this option in isolation. In order to explore it further therefore, it would need to form a hybrid with at least one other option.</p>
Proposed way forward	<p>A hybrid option with the socio-economic option (option E – see below) is proposed. This hybrid option is most focussed on economic drivers, and is therefore named 'Economy'.</p> <p>A further 'super-hybrid' also forms one of the emerging spatial options, encompassing 'Sustainable Travel and Economy' see below.</p>

Growth Option	E – Socio-economic
Consultation feedback: Most preferred option	13%
Consultation feedback: Least preferred option	15%
SWLP Team Officer testing	Officers found it challenging to accommodate development need in the locations defined within this option, as there are few settlements relative to this scenario.
Stakeholder input (either written or during meetings)	
Additional evidence acquired	
Workshop findings – how much where?	Settlements listed in the Scoping document as falling within this option were regularly selected for growth (11/16 – green belt on and 12/16 *– green belt off). This is likely to be due to the option largely focussing on towns across South Warwickshire. *Cubbington is not explicitly listed individually amongst the group placements, though it may be taken into account in some options north of Leamington.
Officer conclusions	Feedback on this option was relatively balanced, though officers have found it challenging to identify how all of the growth could be accommodated in the small number settlements within this option. The settlements within this option are largely the urban areas, in addition to a small number of relatively small settlements. This option alone is therefore considered unlikely to be a realistic solution.
Proposed way forward	As above, it is proposed to create a new hybrid option with ‘Enterprise’ called ‘ Economy ’. In addition, this option forms part of a new larger hybrid proposal: ‘ Sustainable Travel and Economy ’

Growth Option	F – Urban Areas
Consultation feedback: Most preferred option	10%
Consultation feedback: Least preferred option	13%
SWLP Team Officer testing	Officers found it challenging to accommodate development need in the locations defined within this option.
Stakeholder input (either written or during meetings)	
Additional evidence acquired	Settlement Design Analysis
Workshop findings – how much where?	The main towns were regularly selected for further growth – including the Warwick, Leamington Spa and Whitnash conurbation, and Stratford-upon-Avon. Kenilworth was commonly selected within the green belt policy off exercise. No group however devised a strategy where <u>only</u> the urban areas were considered.
Officer conclusions	<p>This option at the Scoping stage focussed only on the main urban areas, and was not particularly well supported within the feedback received.</p> <p>The settlement design analysis work broadly identifies that further substantial growth in some directions around the main settlements is unfavourable in terms of connectivity and accessibility, which are key to achieving the overarching principles of the plan. As such, this option on its own is considered incompatible with the plan objectives. It is concluded that therefore that this option should not be taken forward as a stand-alone scenario. The urban areas however remain a component of all other growth scenarios.</p>
Proposed way forward	This option will not be developed further at this stage.

Growth Option	G - Dispersed
Consultation feedback: Most preferred option	13%
Consultation feedback: Least preferred option	36%
SWLP Team Officer testing	There are multiple spatial scenarios within this option, which could potentially deliver the required level of growth
Stakeholder input (either written or during meetings)	Feedback from infrastructure providers generally does not favour this option. As a general rule, a larger number of smaller development locations spread out across the area result in requirements for relatively small-scale upgrades to infrastructure (e.g. schools, GP practices, bus services etc) which are difficult to fund and deliver without substantial critical mass.
Additional evidence acquired	Settlement Design Analysis
Workshop findings – how much where?	<p>Growth of at least 1,000 dwellings was frequently placed, sometimes as a smaller new settlement, and often as significant extensions to existing villages.</p> <p>Groups were divided on how much they dispersed growth in smaller placements. 4 groups made no placements of less than 500 dwellings, while one group dispersed 21% of their dwellings in small placements. In total across all groups, 5% of dwellings were dispersed in placements of less than 500 dwellings.</p>
Officer conclusions	<p>There are multiple spatial scenarios within this option, potentially therefore offering greater flexibility and choice. This option however was least preferred by the most respondents to the Scoping Consultation, a point reinforced by discussions with infrastructure providers.</p> <p>Officers have found it to be a finely balanced conclusion whether to continue to explore this option. Further evidence would be beneficial to inform how/whether to proceed with this option.</p> <p>Even if this option were not taken forward, some limited growth might still need to occur in some smaller settlements to support the overall sustainability of these places.</p>
Proposed way forward	Continue to test this option through Issues and Options.

Growth Option	New Option (super-hybrid) – Sustainable Travel and Economy
Consultation feedback: Most preferred option	Circa 38% of respondents advocated for a hybrid of options. Analysis of the feedback indicated that growth options A, B and D were most often cited as those which should be combined with others
Consultation feedback: Least preferred option	N/A – this is a new hybrid option
SWLP Team Officer testing	-
Stakeholder input (either written or during meetings)	N/A – this is a new hybrid option
Additional evidence acquired	All of the above
Workshop findings – how much where?	Many workshop groups discussed different strands to their strategies, and none explicitly aligned with any one of the growth options identified in the Scoping Consultation. Different placements were often made for different reasons within the strategy, thus reinforcing the principle of a hybrid approach generally.
Officer conclusions	<p>This option is designed to respond to feedback received to the Scoping Consultation. It responds to the preference for hybrids in general, and specifically includes original options A (rail), B (bus), and D (Enterprise), which were most regularly highlighted for this purpose (see p235 of the Consultation Summary report)</p> <p>In addition, this new option responds discussions throughout meetings and workshops to date.</p>
Proposed way forward	Test this new option: Sustainable Travel and Economy

South Warwickshire Local Plan Part 1

Stage 2: Issues and Options Consultation

January 2023

Yellow highlight – final links to be added when available prior to consultation

DRAFT

Summary

This Issues and Options consultation is the second stage in preparing the South Warwickshire Local Plan – a new Plan for Stratford-on-Avon and Warwick Districts, following the Scoping and Call for Sites consultation in 2021. The new Local Plan will affect the way we live, work, visit and play in South Warwickshire to 2050. As well as working collaboratively on this Plan, both Councils are also preparing other plans on specific topics relevant to their District. Those plans are entirely separate to this South Warwickshire Local Plan.

A Local Plan sets out the planning policies that the councils will use to assess applications for development as well as identifying (allocating) sites for new development proposals to meet our future development needs in terms of housing and job growth.

It is proposed that this Part 1 of the South Warwickshire Local Plan will set out the overall strategy for the pattern, scale and design quality of places within South Warwickshire, and make sufficient provision for housing, employment, retail, leisure and other commercial development, along with infrastructure, community facilities, conservation and enhancement of the natural, built and historic environment and planning measures to address climate change mitigation and adaptation. Primarily, the Local Plan sets out how we will grow the South Warwickshire economy and create jobs through delivery of the net zero carbon agenda. It will ensure that the necessary infrastructure and the right type and number of homes are delivered to support the level of jobs we want to see across South Warwickshire to 2050.

The adoption of this overarching Part 1 would then enable other ‘Part 2’ planning policy documents to come forward and set out detailed policies for specific areas, neighbourhoods or types of development. This could include allocating sites and the provision of infrastructure at a local level, establishing design principles and setting out other more detailed planning policies.

The first part of the document ([chapter 1](#) and [chapter 2](#)) explains the **context for preparing the Local Plan, what we have done so far** and how you can **get involved**.

[Chapter 3](#) sets out the **vision and strategic objectives** centred around five overarching principles that will underpin the Plan and sit at its heart:

- A climate resilient and net zero carbon South Warwickshire
- A well-designed and beautiful South Warwickshire
- A healthy, safe and inclusive South Warwickshire
- A well-connected South Warwickshire
- A biodiverse and environmentally resilient South Warwickshire

[Chapter 4](#) provides the options for how **South Warwickshire’s development needs** can be met sustainably including a range of potential **spatial growth options** and identified locations for **possible new settlements**. This is based on high-level assessment work and we want to hear your views on these options to inform which locations we explore in more detail.

[Chapter 5](#) and [chapter 6](#) set out the policy options for delivering the area’s **economic and housing needs**, followed by chapters 7-11 which set out the remaining **policy options** under the 5 overarching principles.

Summary

[Chapter 12](#) sets out the approach we are proposing with regard to **Part 1 and Part 2 Plans**, and how existing adopted policies will be dealt with through this approach, while [Chapter 13](#) provides a **glossary** to this Issues and Options consultation.

A second 'Call for Sites' is running simultaneously with this consultation. This is an opportunity to submit land/sites to us so that it can be assessed and considered through the plan-making process. Land which was submitted in the previous Call for Sites exercise in 2021 should not be provided again unless there are proposed changes to the boundary or the proposed use.

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1. Introduction

1.1 Purpose of the Consultation

Stratford-on-Avon District and Warwick District Councils are seeking the views of residents, businesses, developers, infrastructure providers, community groups and all other stakeholders on how we should plan for the future of South Warwickshire to 2050. This new local plan is about where and how, new jobs, infrastructure and housing are all delivered in the context of place-shaping and addressing climate change.

We are still the early stages of the process (stage 2 of 8) and further public consultation will follow. This consultation sets out a number of ideas and asks a series of questions. We want your views on the **ISSUES** we raise and the **OPTIONS** we propose as possible solutions.

1.2 South Warwickshire Today

Located to the south of the West Midlands' conurbation, South Warwickshire covers 488 square miles of predominately open countryside and is made up of Stratford-on-Avon and Warwick District Council Areas. With good motorway and rail connections between London and Birmingham, South Warwickshire is the gateway to the West Midlands.

South Warwickshire has a varying landscape and includes parts of 5 national landscape character areas, of which the Cotswold Area of Outstanding Natural Beauty is one, with 8% of the total area of South Warwickshire falling into this specific national landscape designation. Nearly a third of South Warwickshire is part of the West Midlands Green Belt, which is designed to prevent the unplanned expansion of urban areas.

Figure 1 – South Warwickshire Facts and Figures

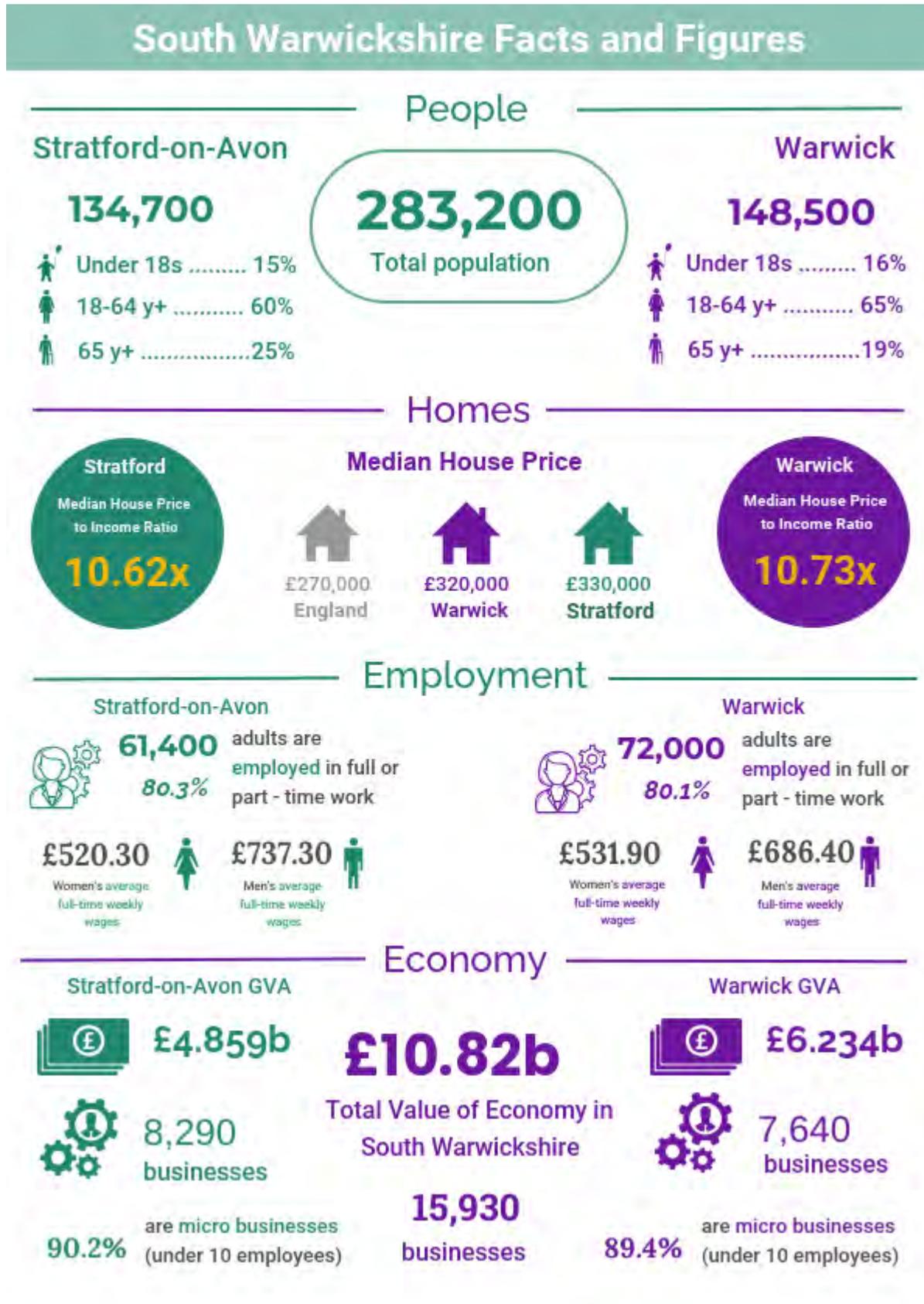
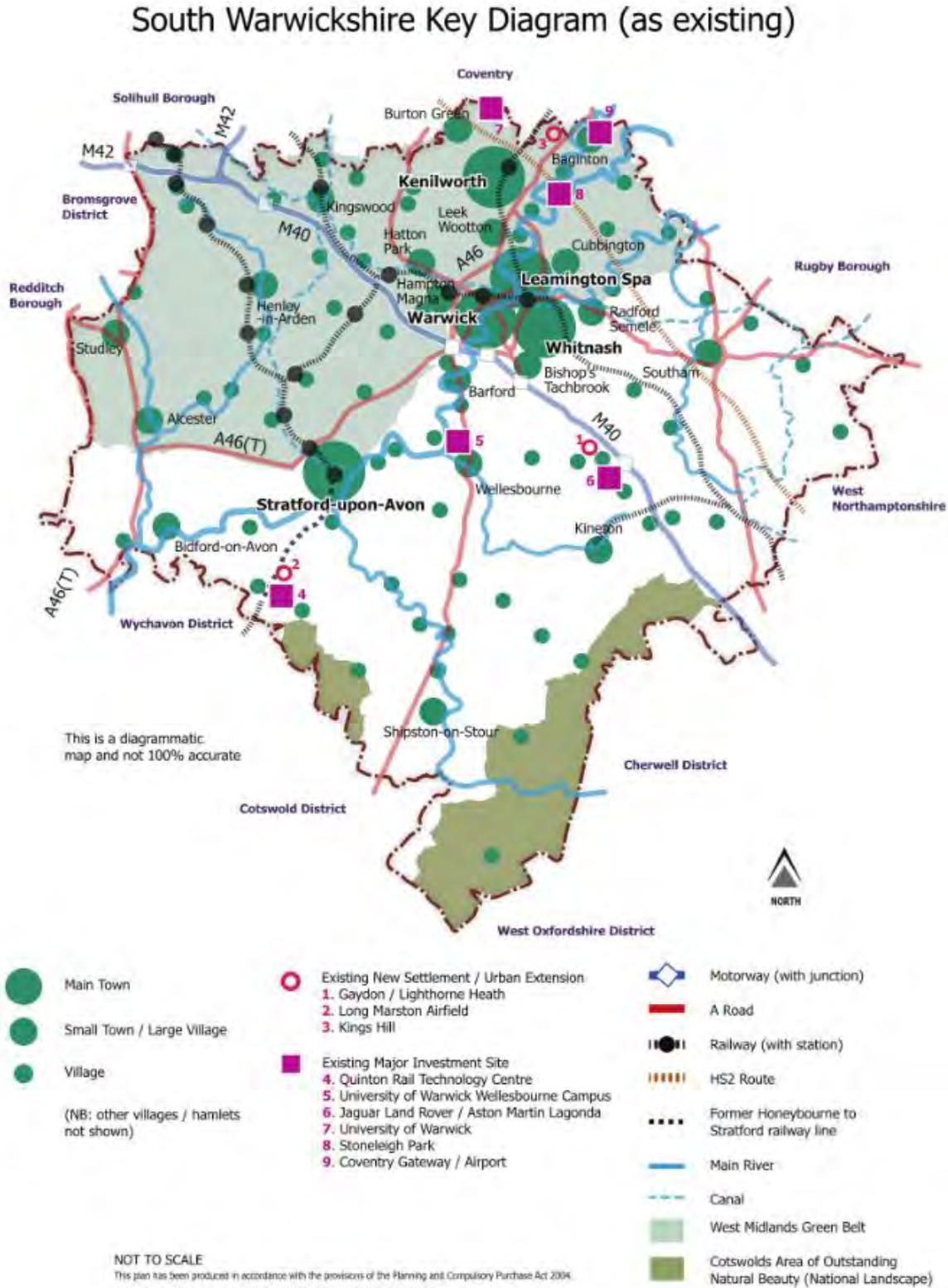


Figure 2 – South Warwickshire Key Diagram (as existing)



1.3 What is the South Warwickshire Local Plan (SWLP)

A Local Plan is a legal document that councils are required to prepare that sets out the future land use and planning policies for an area over a set period of time. It will contain the planning policies that the two councils will use to determine planning applications. The South Warwickshire Local Plan will be the Local Plan of both Stratford-on-Avon District Council and Warwick District Council areas and will run up to 2050. It will also set out how we will deliver new jobs, new infrastructure and new homes to grow South Warwickshire's economy and help deliver on both Council's commitment to address the climate change emergency.

Once Part 1 is fully adopted, it will replace the existing strategic policies of the [Stratford-on-Avon District Council Core Strategy](#) and [Warwick District Councils Local Plan](#). Local Plans are required to be in line with the [National Planning Policy Framework](#) and should seek to achieve sustainable development taking into account, economic, social and environmental factors. In addition to the NPPF, the South Warwickshire Local Plan will also need to take account of the [Environment Act](#), the [sustainable development goals](#) and the emerging legislation contained within in the [Levelling up and Regeneration Bill](#).

The South Warwickshire Local Plan will also need to take account of other plans and strategies including those of the West Midlands Combined Authority (WMCA) and Warwickshire County Council, with particular attention being made to the [Local Transport Plan](#) which sets out the transport needs, challenges and priorities and objectives for the county, as well as the [Minerals and Waste Core Strategy](#) which sets out the strategy and policies for guiding minerals and waste development in the county. Consideration will also need to be given to the plans and proposals of various infrastructure providers to ensure that new development is supported by the necessary infrastructure.

Neighbourhood Plans, which are prepared by Parish Councils or Neighbourhood forums, are required to be in line with the strategic context of the Local Plan, it may therefore be that communities will wish to review their neighbourhood plans in due course. Importantly, however, much of the detailed content of neighbourhood plans won't be affected by Part 1 of the new South Warwickshire Local Plan and policies set out in existing neighbourhood plans will continue to be relevant.

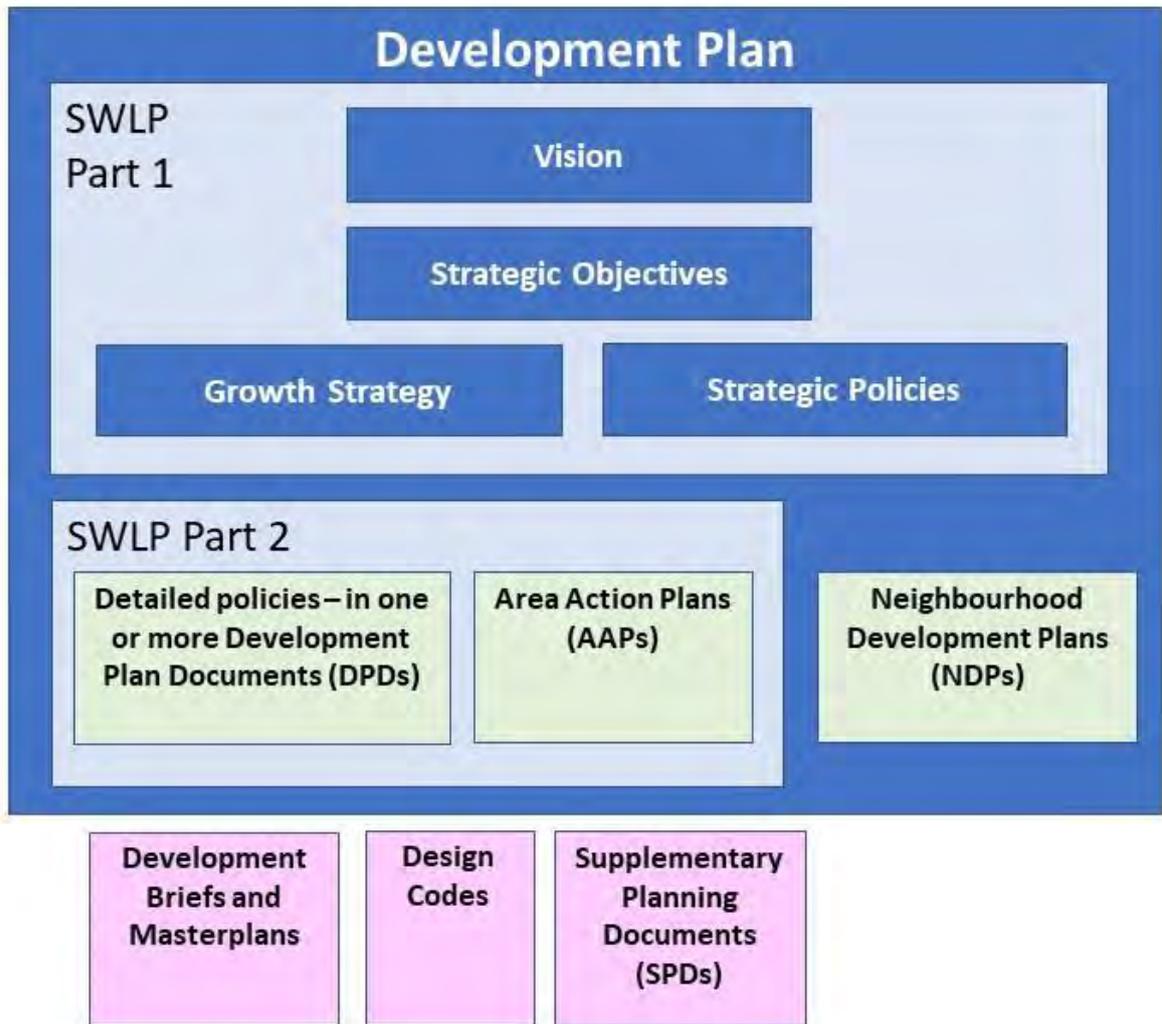
1.4 What is the SWLP Part 1?

Rather than have a single comprehensive plan it is envisaged that the plan will be broken down into separate parts as shown in Figure 3.

Part 1 of the Plan will establish a robust and flexible framework which will set out where and how much development should take place across South Warwickshire. This will include core principles and strategic policies that provide a context in which more detailed policies will follow. There is an exception to this in relation to the climate change policies. Due to the climate change emergency, it is expected that there will be a full suite of policies on climate change in part 1. As well as strategic policies, part 1 of the plan will also look to include strategic sites, which are sites that are critical to the delivery of the plan.

Existing policies which are not included in part 1 of the plan could be saved and subsequently incorporated into Part 2 of the plan and/or other policy documents as appropriate. Part 2 of the plan will contain more detailed policies or policies that are much more specific to a local area. For example, a particular issue in Royal Leamington Spa, but not necessarily South Warwickshire, is the need to manage purpose-built student accommodation.

Figure 3: Different Parts of the SWLP



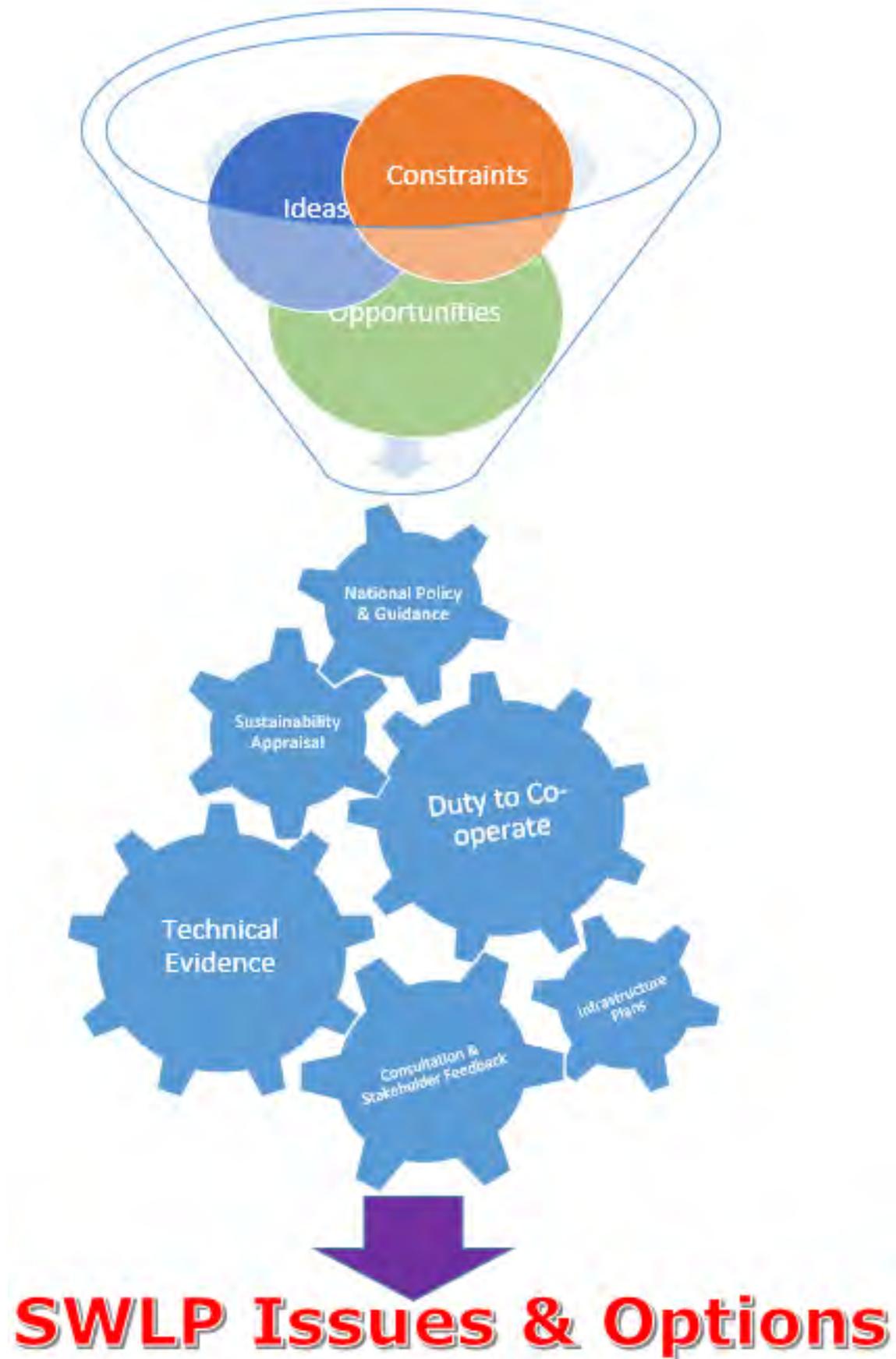
Further detail around the proposed contents of the Part 1 plan can be found in [Chapter 12](#).

The plan period is the length of time that the policies in the Local Plan will remain valid for. This Local Plan for South Warwickshire will run up to 2050 which will allow for a flexible, robust, and long-lasting framework for development. By taking a long-term perspective, we can better take account of the investment plans of infrastructure providers to better ensure that new jobs and homes are supported by the necessary infrastructure.

1.5 How is the SWLP being prepared?

In preparing the SWLP we need to base our proposals on expert technical evidence covering a range of planning topics. Our interpretation of this evidence is influenced by the feedback we receive from stakeholders, including the views of residents and businesses. Everything we do is also within the context set by national planning policy and guidance.

Figure 4 – Preparation of the SWLP



Ultimately, the SWLP must contribute to the achievement of sustainable development, and this means balancing the need for more jobs and homes against the impact on the built and natural environment. To help us understand and mitigate those impacts we prepare a [Sustainability Appraisal](#) that also accompanies this consultation document.

1.6 What have we done so far?

Scoping and Call for Sites Consultation

Preparing the SWLP is not a single event and there are numerous stages of consultation (see Figure 5 below). The first consultation was the [Scoping and Call for Sites consultation](#) which took place in 2021. There were two aspects to that consultation; firstly to explore what the broad content of the SWLP should be and secondly to seek suggestions for sites for development through the call for sites request.

We have analysed the responses to the consultation and they are available to view in the accompanying [consultation statement](#). More importantly, the feedback has been used to inform the content of this Issues and Options consultation.

Through the call for sites, 558 sites were put forward for a range of uses, and each one has been processed and mapped onto the [interactive call for sites map](#). Although the sites have been published no analysis of the sites has yet taken place, and therefore publication is by no means an endorsement by either Council that the site is either suitable for development or will be included within the local plan itself.

A further call for sites is running alongside the Issues and Options consultation, and further details on this can be seen in [Section 2.4](#).

Stakeholder Engagement

As part of the preparation for the Issues and Options Consultation document we have engaged with various stakeholders, including Parish Councils and key infrastructure organisations, and have conducted interactive stakeholder sessions. Full details of the stakeholder engagement can be found within the topic paper "[Evolving the Spatial Growth Options – the story so far](#)".

Technical Evidence

Officers on the SWLP team have also commissioned a number of external consultants to conduct numerous technical assessments. The Technical Evidence that has been obtained following the Scoping and Call for Sites Consultation, and that will be published alongside the Issues and Options consultation is as follows:

- [Bus Accessibility Mapping](#)
- [Estimation of emissions for proposed growth options and new settlements](#)
- [Climate Change Baseline Report](#)
- [Equalities Impact Assessment \(EIA\)](#)
- [Habitats Regulations Assessment \(HRA\)](#)
- [Heritage Assessments](#)
- [Housing & Economic Development Needs Assessment \(HEDNA\) –Coventry and Warwickshire](#)
- [Settlement Design Analysis](#)
- [Sustainability Appraisal \(SA\)](#)
- [Strategic Flood Risk Assessment \(SFRA\) – Part 1](#)
- [Urban Capacity Study](#)
- [\(ADD LINKS\)](#)

Further details on the technical evidence can be found on the [Technical Evidence](#) webpage on the South Warwickshire Local Plan Website. These assessments have all been published so that respondents and interested parties can view the evidence and use it to inform their responses.

1.7 Structure of the Issues and Options Consultation

The issues and options consultation follows on from the Scoping and Call for Sites consultation as mentioned above. It sets out some of the key issues raised at earlier stages of the plan making process and presents a number of options to overcoming these.

This consultation document is split into twelve chapters and at the beginning of chapter 3 onwards there is a short explanation as to the issues covered in that chapter.

Throughout the document we have included boxes containing brief summaries of responses to various issues from the Scoping and Call for Sites consultation. These boxes are intended to help show how your responses have been considered for the Issues and Options. An example box is shown below.

What you said:

- *Text here*

We have also cross referenced back to the two existing local plans so you can see how the new policies proposed in the SWLP may relate to the existing planning policies of the two Councils.

Current Policy Approach:

- *Text here*

Throughout the document there are a number of 'options' which are proposed to help overcome various issues. The Issues and Options Consultation document seeks to determine which of these options residents and stakeholders consider most favourable. In addition to options presented for various policy issues, the document also presents a number of strategic spatial 'growth options'. These spatial growth options will help determine where development takes place across the local plan area, and the Issues and Options consultation document seeks the views of residents and stakeholders, as to which spatial growth option they find most suitable for South Warwickshire. As part of the spatial growth options work, there are also questions regarding New Settlements and any role they may play in helping to deliver the necessary growth required over the plan period. There are also a number of questions which officers are seeking resident and stakeholder views on.

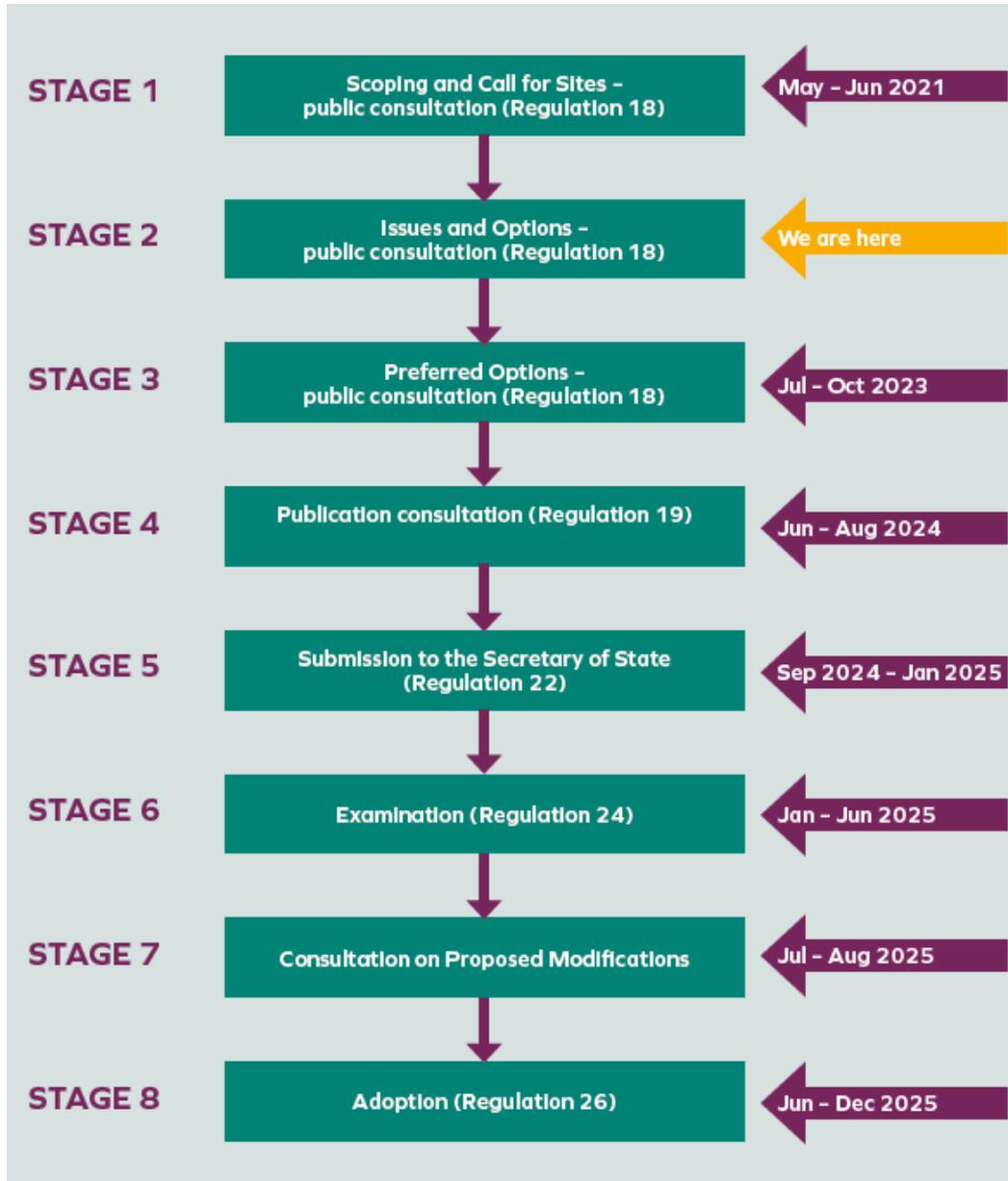
A new 'Call for Sites' exercise is running simultaneously to this consultation. This provides an opportunity to submit land/sites to us which will be assessed, and as appropriate considered in the plan-making process. This is further to a similar exercise undertaken in 2021 (see Section 1.5 above ['what we have done so far'](#)).

We are seeking sites for a range of uses to support the objectives of the emerging SWLP. These should not however duplicate previous submissions which are already recorded (see [interactive map](#)). We are especially keen to attract sites which would support one or more of the spatial growth options within this document, and sites which could support the transition to Net Zero, such as sites which could be used for renewable energy generation.

The interactive form and further information on the Call for Sites is available here [\(ADD LINK\)](#).

The Issues and Options is the second stage in the process of preparing the SWLP and we still have a long way to go. As shown in Figure 5. Preparing the local plan is a process of refinement as we narrow down our ideas into our preferred option and final plan.

Figure 5 - Timetable for the SWLP



1.8 Next stages after this consultation

Once the Issues and Options Consultation has closed, officers will analyse the responses and the gathered technical evidence and use this information to inform the next iteration of the plan, the Preferred Options. The Preferred Options document will present a refined approach to the issues raised within this document, and the spatial growth strategy, based on the feedback received and analysis of the evidence gathered. It will show more clearly the direction of travel for development within South Warwickshire.

In addition to analysing the existing evidence base and the responses received, officers will also commission and undertake additional Technical Assessments/Studies to inform the plan as it progresses. This may include:

- Air Quality Assessment
- Biodiversity & Green Infrastructure Assessment
- Climate Change Impact Assessment
- Equalities Impact Assessment (EIA)
- Green Belt Study
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Heritage Assessment
- Infrastructure Delivery Plan
- Landscape Character Assessment
- Playing Pitch Strategy
- Site Delivery & Viability Studies
- Strategic Environmental Assessment / Sustainability Appraisal (SA/SEA)
- Housing and Economic Land Availability Assessment (HELAA)
- Strategic Flood Risk Assessment (SFRA) Part 2
- Town Centre Studies
- Transport Assessment
- Water Cycle Study

Once the Preferred Options document has been produced, taking into consideration the responses from the Issues and Options and the findings from the technical assessments, it will go out to consultation. Following this, the Publication Draft of the South Warwickshire Local Plan will be created.

2. How to have your say

The consultation document contains a number of issues that the South Warwickshire Local Plan seeks to address. These issues have been identified using the responses to the scoping and Call for Sites consultation (which can be viewed in full in the [consultation statement](#)), and ongoing conversations with key stakeholder. In response to the issues identified, officers have formed various 'options' to overcoming these, and would like to know which options you think are most appropriate. You may respond to as many, or as few of these issues & options as you like. Whilst we have identified specific issues and options for you to respond to, comments on any aspect of this consultation document are invited, and the questions at the end of each section will allow you to do this.

The period for identifying your preferred options and submitting any comments is between Monday 9th January and Monday 20th February 2023. **Comments received after the deadline will not be considered.**

2.1 How to View the Consultation

Online - The consultation content and supporting information is available to view at www.southwarwickshire.org.uk/swlp

Paper Copies – Physical copies of the consultation document are available to view at*:

- Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon, CV37 6HX
- Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5HZ
- Town Hall, Royal Leamington Spa
- Alcester Library
- Bidford Community Library
- Harbury Community Library
- Henley Community Library
- Kenilworth Library
- Kineton Community Library
- Leamington Spa Library and Information Centre
- Lillington Library and Information Centre
- Shipston-on-Stour Library and Information Centre
- Southam Library and Information Centre
- Stratford-upon-Avon Library and Information Centre
- Studley Community Library
- Warwick Library and Information Centre
- Wellesbourne Library and Information Centre
- Whitnash Library and Information Centre
- Brunswick Healthy Living Centre

*Please check opening hours and any restrictions prior to visiting

If you would like to purchase your own copy of the consultation document, please contact the SWLP team

2.2 How to Comment

Representations can be made to this consultation by submitting comments using the online consultation portal. [LINK to consultation portal](#)

Each section has a series of questions on key topics where we would like your views. In addition, there is a ‘free text’ question at the end of each chapter, to gather other important views which are not covered by a specific question.

You are welcome to answer as many questions as you wish. This is a lengthy document, so it is up to you whether you focus on topics of particular interest to you, or answer a broader range of questions.

Using the online consultation portal is the most straight forward way to share your views with us. This method also helps ensure that officer time is used most efficiently in handling and analysing consultation responses. However, if you are unable to comment using the online form, we will also accept responses by email or post to **either**:

Stratford-on-Avon District Council

The SWLP Team, Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon, CV37 6HX

swlp@stratford-dc.gov.uk

Warwick District Council

The SWLP Team, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5HZ

swlp@warwickdc.gov.uk

2.3 Contact Us

If you have any questions or queries regarding the consultation document or the process of responding, please get in touch. Officers will be available to answer your questions throughout the consultation period either via email (swlp@stratford-dc.gov.uk or swlp@warwickdc.gov.uk) or over the phone (SDC: 01789 267575 or WDC: 01926 456525) .

2.4 Call for Sites

As highlighted above, a second ‘Call for Sites’ is running simultaneously with this consultation. This is an opportunity to submit land/sites to us so that it can be assessed and considered through the plan-making process. Land which was submitted in the previous Call for Sites exercise in 2021 should not be provided again, unless there are changes to the boundary or the proposed use.

Submissions can be made using the interactive form [\(ADD LINK\)](#) and the period for submitting Call for Sites is between Monday 9th January and Monday 20th February 2023. Further information is available here [\(ADD LINK\)](#)

3. Vision and Strategic Objectives – South Warwickshire in 2050

Chapter 3 considers the Vision and Objectives of the SWLP. This Vision is the high-level goal that the plan is seeking to achieve, with the guiding principles for how this will be achieved. The objectives provide greater detail around how the Vision will be delivered.

Issue V1: Vision for the Local Plan

The Scoping Consultation put forward a Vision and Strategic Objectives for the South Warwickshire Local Plan. These have been modified in light of responses to that consultation, discussions with stakeholders, and other emerging evidence.

What you said:

- Should include a reference to sustainable development, in line with the requirements of the NPPF
- Should include a specific reference to housing
- Be pro-active regarding economic growth
- Prioritise climate change
- A disconnect between the vision and the strategic objectives

The Vision sets out how we want to see the area grow and evolve up to 2050. It can be seen as a high-level ambition for South Warwickshire, including a set of overarching principles which sit at the heart of, and run throughout the South Warwickshire Local Plan. From this Vision flow the Strategic Objectives, the growth strategy, and the specific policies within the plan.

The main changes made to the Vision since the scoping consultation are:

- Drawing out and making explicit the way that sustainable development sits at the heart of the plan
- Increasing the emphasis on responding to the climate emergency
- Rephrasing to make the Vision more people-focussed
- Making clearer the role housing and jobs play as a key part of this Vision
- Adding a fifth overarching principle regarding design and beauty

The vision is to meet South Warwickshire's sustainable development needs to 2050, while responding to the climate emergency. Where appropriate and agreed, this could include unmet need from neighbouring authorities. The plan will provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time. Five overarching principles will determine how this development is delivered:

- **A climate resilient and Net Zero Carbon South Warwickshire** – adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development
- **A well-designed and beautiful South Warwickshire** – creating spaces where people want to be, which respect and reflect the existing beauty and heritage of the area
- **A healthy, safe and inclusive South Warwickshire** – enabling everyone to enjoy safe and healthy lifestyles with a good quality of life

- **A well-connected South Warwickshire** – ensuring that development is physically and digitally connected, provided in accessible locations, and promotes active travel
- **A biodiverse and environmentally resilient South Warwickshire** – strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire

Issue V2: Vision for Places

The Scoping Consultation suggested including visions for individual places.

What you said:

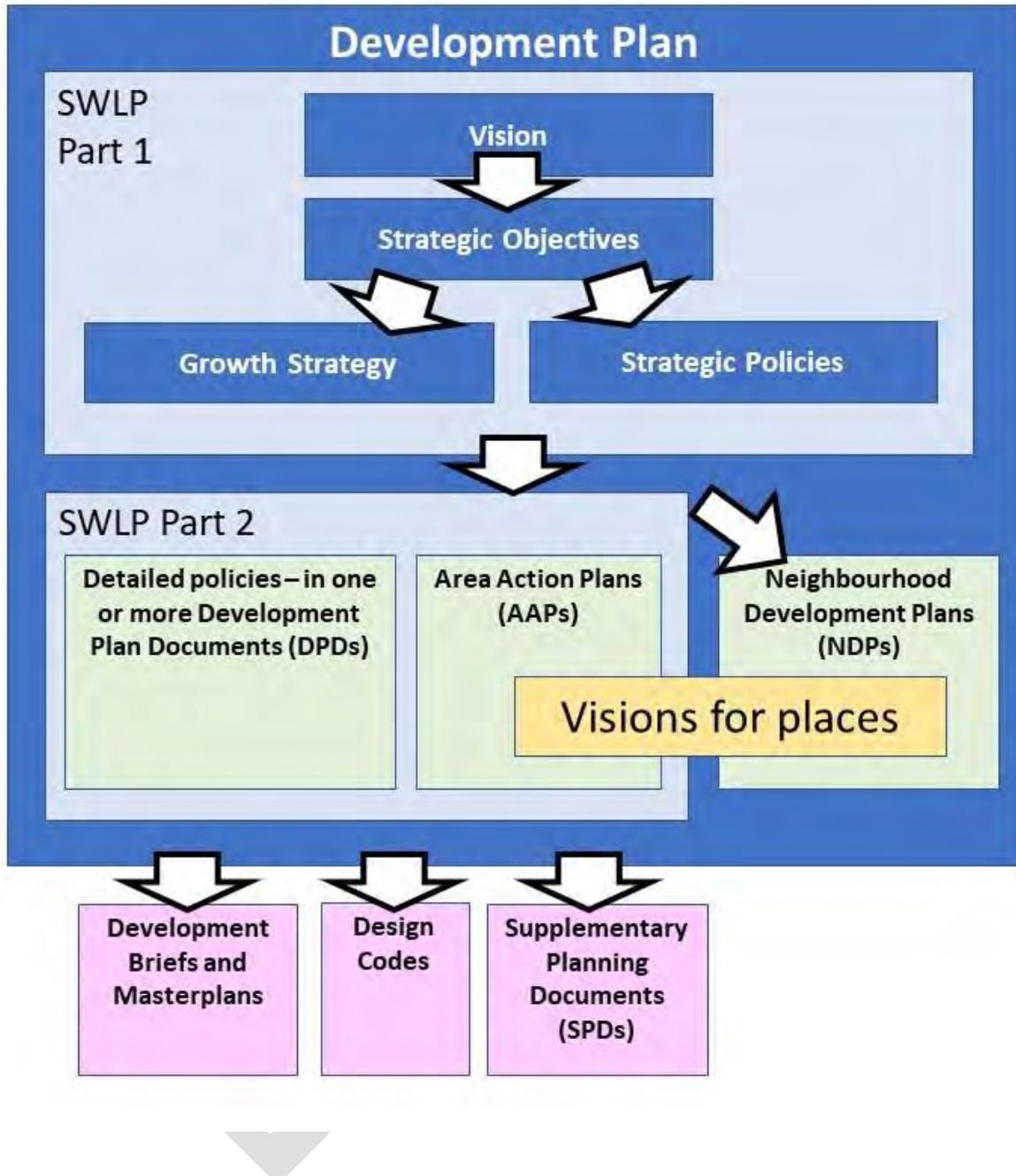
- 25% agreed with the approach suggested
- Visions for places seen as the remit of Neighbourhood Development Plans, rather than a Local Plan
- Suggestions made for individual places, or types of places, that should or should not have visions for places
- Suggestions for the content of visions for places

In a change from the position set out in the Scoping Consultation, it is now suggested that the SWLP will not include “Visions for Places” as part of the overall Vision. There are two principal reasons for this decision.

- 1) Certain elements of the local plan can be seen as forming a hierarchy. The content of the overall Vision determines the Strategic Objectives; the content of the Strategic Objectives then determines the Growth Strategy and policies. The Growth Strategy would then determine how much development will be directed to an individual place – and only when this is known could a Vision for that place be written. This means that the Vision for Places does not fit with the overall Vision in the hierarchy.
- 2) It is considered that Neighbourhood Development Plans (NDPs) are the most appropriate place for Visions for Places to be determined. NDPs offer the best opportunity for Visions for Places to reflect the needs and wishes of the local community. NDPs must accord with the adopted Local Plan, so these would by necessity fit with the chosen Growth Strategy. Even so, if two different documents each contained a Vision for a single place, there is potential for disparity and confusion.

The SWLP and associated documents will of course still play a role in determining how individual places evolve to 2050. This may be in the form of Area Action Plans, development briefs, and masterplans.

Figure 6 – Suggested location for Visions for Places within the Development Plan



NB further detail on the content of Part 1 and Part 2 plans can be found in the chapter “[Plan Content](#)”.

Issue V3: Strategic Objectives

The Strategic Objectives aim to provide a greater level of detail as to how the Vision will be delivered in South Warwickshire.

What you said:

- 53% agreed with the strategic objectives as presented
- Some responses suggested prioritising certain objectives over others, especially delivering homes, and climate change
- Suggestions for the content of individual objectives
- Clearer links needed between the vision and objectives

Since the Scoping Consultation, the main change is that the Strategic Objectives have been re-ordered, to make it clearer how these flow from the Vision. A further objective relating to the heritage assets in South Warwickshire has been added, where before this was presented as part of an environmentally-focussed objective.

Meeting South Warwickshire's Sustainable Development Needs

- **Supporting vibrant and distinct centres**
Responding to the changing roles of town centres given the growth in internet shopping, and in the context of emerging from the COVID pandemic.
- **Providing infrastructure in the right place at the right time**
Ensuring that the infrastructure needed to support the growth in new homes and jobs is secured through new development, and is provided when people need it
- **Developing opportunities for jobs**
Accommodating the growth in employment opportunities that build upon our strong and diverse economy, including innovative industries and technologies, embracing the potential of the green economy.
- **Delivering homes that meet the needs of all our communities**
Allowing for the growth in new homes that meet the diverse needs of all our residents, including affordable, student, specialist and self and custom build housing, along with the accommodation needs of our gypsy and traveller and travelling showpeople communities.

A resilient and Net Zero Carbon South Warwickshire

- **Contributing towards Net Zero Carbon targets**
Ensuring that new development does not cause a net increase in carbon emissions, that new developments are resilient to a changing climate, and that every opportunity is taken to reduce existing carbon emissions and mitigate against climate harms.

A well-designed and beautiful South Warwickshire

- **Creating attractive places**
Focusing on the design of new development to create great places, spaces and buildings that are of a high quality and cater for the needs of all users and which respect the setting of our many settlements.
- **Protecting and enhancing our heritage and cultural assets**
Protecting the wealth of heritage and cultural assets in South Warwickshire, and where possible enhancing access and public understanding of these assets
- **Enriching the tourism potential**
Enriching the quality of the visitor experience through the wealth of cultural, heritage and countryside assets that the area has to offer.

A healthy, safe and inclusive South Warwickshire

- **Improving the health, safety and quality of life of our communities**

Creating healthy places for all sections of the community, which contribute to physical and mental wellbeing, combat loneliness and isolation, lower levels of pollution, and are free of crime and the fear of crime.

A well-connected South Warwickshire

- **Connecting people to places**

Increasing and improving access to sustainable and active travel options that connect people to centres, jobs, education, cultural facilities, green spaces and the countryside.

A biodiverse and environmentally resilient South Warwickshire

- **Protecting and enhancing our environmental assets**

Protecting what already exists and maximising opportunities for enhancement including improvements to the green space network through tree planting and other biodiversity initiatives.

Q-V3.1: Do you agree that the Vision and Strategic Objectives are appropriate? Y/N/DK

Q-V3.2: If no, please indicate why:

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4. Meeting South Warwickshire’s Sustainable Development Needs

Chapter 4 sets out various options as to how we might meet our development needs to 2050 (e.g. infrastructure, jobs and housing). The chapter is split into 2 sections and seeks your views on the following issues:

[4.1 South Warwickshire’s Development Requirements](#)

- [Issue I1: Infrastructure Requirements and delivery](#)
- [Issue I2: Community Infrastructure Levy \(CIL\)](#)
- [Issue I3: Infrastructure Safeguarding](#)
- [Issue I4: Viability and Deliverability](#)

[4.2 Development distribution strategy for South Warwickshire](#)

- [Issue S1: Green & Blue Corridors](#)
- [Issue S2: Densification](#)
- [Issue S3: Using Brownfield Land for development](#)
- [Issue S4: The potential for new settlement\(s\)](#)
- [Issue S5: Growth of existing settlements](#)
- [Issue S6: A review of Green Belt boundaries](#)
- [Issue S7: Refined Spatial Growth Options](#)
- [Issue S8: Small scale development outside of the chosen spatial growth option](#)
- [Issue S9: Settlement boundaries and infill development](#)
- [Issue S10: Any other development strategy issues](#)

4.1 South Warwickshire’s Development Requirements

The primary role of the Local Plan is to promote a sustainable pattern of development that seeks to meet the needs of South Warwickshire, align growth and infrastructure, improve the environment, mitigate climate change and adapt to its effects.

To understand South Warwickshire’s development needs a sub-regional [Housing and Economic Development Needs Assessment or HEDNA](#) has been undertaken for the Coventry and Warwickshire area, based on up-to-date information from the 2021 census.

The HEDNA provides evidence about how many jobs we should seek to create by 2050 and then how many homes will be needed to house the workers for those jobs. The detail of these requirements is included at Chapters 5 and 6 of this Issues and Options document. However, in order to deliver growth, it is critical that we seek to address the infrastructure implications associated with new development.

Issue I1: Sustainability Appraisal

A Sustainability Appraisal (SA) is an essential component in the production of the Local Plan, informing and influencing plan preparation to optimise its sustainable development performance.

To help ensure that the Local Plan includes the most suitable planning policies and development allocations, the sustainability appraisal identifies, describes and evaluates a number of different reasonable alternative policies and development locations.

An SA has been prepared to support the Issues and Options Consultation which explores the following reasonable alternatives as part of the plan making process:

- 5 Growth Options which provide details about where development should be distributed at a strategic scale across the South Warwickshire area
- 7 New Settlement Locations for large-scale development of not less than 6,000 new homes and associated infrastructure
- 32 Broad Locations which represents options for up to 2,000 homes located around the main settlements for medium scale development and associated infrastructure in any one Broad Location
- 22 Small Settlement locations for intermediate scale development for between 50-500 homes in any one location, typically associated with smaller settlements and villages.
- 88 Policy alternative options for shaping the relevant policies. Subjects include for example climate change, tourism and health.

The appraisal process uses an SA Framework to evaluate how the different reasonable alternatives perform against sustainability objectives. It provides a way in which sustainability effects can be described, analysed and compared.

Evaluation of the Broad Locations, Small Settlements, Growth Options and New Settlements all include a summary of best performing options. At this stage it is difficult to identify stand out best performing options because they all perform best for different SA Objectives and rarely does one option emerge as a best overall option.

It is however possible to begin to identify consistently, poor-performing options and these should be possibly removed from further consideration.

The SA Report is available to view [here](#). The SA process will take on board any comments on the SA and use them to furnish the next report with greater detail and accuracy.

Table 1 - SA Key for presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributions to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributions to the achievement of the SA Objective to some extent.	+
Negligible Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Adverse Impact	The proposed option prevents the achievement of the SA Objective to some extent. Mitigation solutions are achievable, and or complex, with a relatively low level of intervention.	-
Major Adverse Impact	The proposed option prevents the achievement of the SA Objective to a significant extent. Mitigation solutions are likely to be complex, if at all possible. A high level of intervention is required.	--

Q-11: Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

Issue I2: Infrastructure Requirements and delivery

What you said:

The most common concerns relating to infrastructure in South Warwickshire relate to transport, utilities, education, green infrastructure and health facilities and a variety of locations were identified as having particular issues.

Some suggestion that there is the potential for infrastructure issues to be mitigated as well as the Plan to plan positively and seek to overcome infrastructure concerns where development would otherwise bring benefits.

The sufficient provision of infrastructure is an essential element of creating sustainable communities, centred around that which delivers social, environmental and economic objectives. Delivering this infrastructure in a timely manner in order to support new development is important and in some areas there is a view that in the past infrastructure provision has not matched the level of growth and/or not been delivered at the right time.

Current Policy approach

Policy document	Policy reference	Page no.	Policy Summary
Warwick District Local Plan	DS1	15	<p>Development expected to contribute towards provision of measures to directly mitigate impact and physical, social and green infrastructure to support the needs associated with the development</p> <p>To be provided in a timely manner to support the objectives of the Plan</p> <p>Developer contributions in the form of planning obligations and CIL will contribute towards strategic infrastructure required to support the overall development of the Plan.</p>
Stratford-on-Avon District Core Strategy	CS.26	213	<p>Infrastructure, services and community facilities to be put in place to mitigate the impact of development</p> <p>Existing facilities to be retained unless satisfy a number of criteria</p> <p>Open Space and Recreation facilities to be provided in new housing developments. Loss of existing open space to be resisted unless satisfy a number of criteria.</p>
Stratford-on-Avon District Core Strategy	CS.27	219	<p>Intention to introduce CIL and continue use of S106 and S278 Agreements for affordable housing and local infrastructure. Infrastructure should be delivered concurrently with or in advance of development and have regard to phasing of housing delivery</p>

Work with infrastructure providers to date has identified that some of the infrastructure that supports our communities is currently at or nearing capacity. In light of the new growth required across South Warwickshire up to 2050, a review of infrastructure needs is required so that measures can be put in place to ensure that this new growth is supported by appropriate and timely infrastructure. This includes local, strategic and cross-boundary infrastructure requirements.

The Local Plan needs to align infrastructure requirements to the development strategy to ensure that it is truly sustainable, this links directly to the five overarching principles of the Local Plan:

- Addressing climate change

Supporting **renewable and low carbon energy** and associated infrastructure is a key aspect of the transition to a low carbon future.

Infrastructure can be used to support the adaptation to climate change effects, such as through the provision of **green and blue infrastructure** and **water management measures**. Infrastructure may also be affected by climate change (**power, water supply and water quality including sewerage infrastructure, transport etc**) and so planning for resilient infrastructure that is able to adapt to future climatic conditions will be necessary.

- Promoting wellbeing

The provision of **health and education facilities**, along with **affordable housing** is critical to the success of achieving sustainable communities.

Heritage and cultural assets can have a significant impact on a sense of place and the character of the area, engendering a sense of belonging. It is therefore important to ensure that these facilities are considered when development takes place, and can include both built assets and also the provision of outdoor spaces for cultural engagement where appropriate.

Developments can provide for a wide range of infrastructure that can promote healthy, inclusive and safe places. This can include the provision of **pedestrian and cycle connections** within and between neighbourhoods, **high quality public space**, safe and accessible green infrastructure, **sport and recreation facilities, local shops, meeting places, access to healthier food and allotments**.

Development also provides the opportunity to improve **air quality** or mitigate impacts such as through traffic and travel management, and green infrastructure provision and enhancement.

- Improving connectivity

Development proposals need to provide for appropriate **transport infrastructure** and consider the opportunities from existing or proposed transport infrastructure particularly those in relation to **walking, cycling and public transport**.

Advanced, high quality and reliable **communications infrastructure** is essential for economic growth and social well-being.

- Increasing biodiversity

The **Green and blue Infrastructure network** across South Warwickshire has multiple benefits and the need to create, maintain and enhance these networks of habitats and green/blue infrastructure is critical.

Seeking the **creation, conservation, restoration and enhancement of priority habitats** through new development, and identifying and pursuing opportunities for securing measurable **net gains for biodiversity** is a way of achieving this.

- Creating well-designed and beautiful places

Design quality is an important component of the infrastructure that makes a place and includes both that relating to **individual buildings** and the **spaces and places between** them including the potential for **public art**. Preserving and enhancing our existing **built and natural assets** is also an important role of new development.

Infrastructure Delivery

Aligning infrastructure needs to new development is a key objective of the Local Plan and work is ongoing with a wide range of infrastructure providers to enable this. Infrastructure to support new development can be provided in a variety of ways through the planning process depending on the circumstances:

1. On-site directly by the infrastructure provider as a requirement of an individual planning permission – e.g. digital communications, energy, water, roads, cycleways, access to public transport
2. On-site incorporated into the design of the development by the developer – e.g. renewable and low carbon energy, green infrastructure, affordable housing, design quality
3. Off-site through the provision of financial developer contributions to pay for the provision of infrastructure to be provided elsewhere – e.g. education, health facilities, biodiversity restoration

To maximise the ability to secure and deliver infrastructure from new developments all three mechanisms will need to be applied. The first two mechanisms require policies to establish the requirement for which infrastructure is to be required for different types, scales and locations of development in order to make it acceptable.

The third approach requires a system of developer contributions to be in operation to set, calculate, collect and spend financial contributions. The current system utilises a combination of S106 Planning Obligations and the Community Infrastructure Levy (CIL). S106 Planning Obligations are also used to secure some on-site infrastructure such as open space and affordable housing.

S106 Planning Obligations are sought on developments to mitigate the impact of an otherwise unacceptable development to make it acceptable in planning terms, and need to be directly related to the development itself and in scale and kind to it.

Whilst there may be some potential for the use of public sector funding, for example through the West Midlands Combined Authority (WMCA) and the government’s Shared Prosperity fund, the expectation is that the main source of funding will come from developer contributions.

Q-I2: Please select the option which is most appropriate for South Warwickshire

Option I2a: Set out infrastructure requirements for all scales, types and location of development

If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire.

Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy

In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts.

Issue I3: Community Infrastructure Levy (CIL)

The **Community Infrastructure Levy (CIL)** is intended to fund generalised infrastructure requirements across the District in order to support new development. It is a mechanism to secure financial contributions from developers on certain viable developments and can be used to fund the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of the area.

Both Councils currently operate a system of S106 and CIL contributions. Through the [Levelling Up and Regeneration Bill](#) the Government is intending to replace the current system of developer contributions with a new ‘Infrastructure Levy’; the precise details of this are still to be announced and the Local Plan will reflect these changes as preparation of the Plan progresses.

Q-I3: Please select the option which is most appropriate for South Warwickshire

Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan

A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy.

Option I3b: Each District Council to produce its own Levy

Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances.

To support the infrastructure requirements set out within the Local Plan, an Infrastructure Delivery Strategy will be prepared which will set out the key pieces of new infrastructure and the climate resilience of infrastructure needed to deliver the Plan and how this will be delivered. It will be necessary to ensure that developer contributions do not undermine the deliverability of the Plan, to this end the Plan will be informed by robust delivery and viability studies to assess the impact of infrastructure requirements.

Issue I4: Infrastructure Safeguarding

The current local plans seek to safeguard land to help facilitate the delivery of a number of key infrastructure projects across South Warwickshire. Other infrastructure projects may also come to the fore through the plan making process for the SWLP, and these will be considered in the context of the overarching objectives of the plan.

Stratford-on-Avon District

Land has been safeguarded in the Core Strategy in respect of the following proposals subject to the business case being made and funding secured.

- *M42 Widening – land either side of Junction 3a to help reduce congestion where the M40 joins the M42*
- *A46 Improvements – proposal, should funding allow, to widen the stretch of the A46 between the Wildmoor junction at Stratford-upon-Avon and Oversley Hill Farm, on the outskirts of Alcester*
- *Portabello Crossroads – improvements to this junction between the A429 Fosse Way and the B4035 to the west of Shipston-on-Stour*
- *Stratford to Honeybourne former railway – safeguarding the route of the former railway south of Stratford-upon-Avon to Honeybourne to facilitate re-opening*
- *Western Road to Birmingham Road, Stratford-upon-Avon – proposal for new crossing of the canal and creation of a new route between the A3400 Birmingham Road and A422 Alcester Road*
- *Bridgeway Gyratory Improvements – widening of key town centre route that takes traffic from town centre/A439 onto the Clopton Bridge and south across the River Avon*
- *West of Shottery Relief Road – currently under construction as part of the West of Shottery development connecting B439 Evesham Road with the A46 at Wildmoor*
- *Stratford South Western Relief Road – a third crossing of the River Avon to the south-west of Stratford-upon-Avon, connecting A3400 Shipston Road with B439 Evesham Road*

Emerging Site Allocations Plan:

- *A46 Safeguarding – draft proposals to safeguard land at the Bishopton and Wildmoor junctions to facilitate improvements to the A46 should they be deemed necessary.*

Warwick District

- *High Speed Rail 2 (HS2) - will run through the district and is currently under construction. Land has been safeguarded for the route, and space required for the construction process.*
- *Park and Ride Areas of Search – the adopted Local Plan identifies ‘areas of search’ for a potential park and ride facility to the north of Leamington Spa.*

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.26	213	Part D and the Policies map safeguards eight areas of land to facilitate transport improvements across the District. There is a presumption against development that would prejudice the implementation of any scheme.
Warwick District Local Plan	TR4 & TR5	90-95	TR4 seeks to safeguard land of HS2 and areas of search for park and ride. TR5 ensures the safe operation of aerodromes.

Q-I4.1: Should we include a policy to safeguard specific infrastructure schemes within the SWLP? Y/N/DK

Q-I4.2: Please add any comments you wish to make about these specific safeguarding provisions

Issue I5: Viability and Deliverability

The development strategy for South Warwickshire needs to be both deliverable and viable, which means that there is a sufficient level of confidence that the sites and locations identified for growth are able to come forward and deliver all that is required of them in terms of necessary infrastructure provision.

All of the sites considered for development as part of the growth strategy will be assessed through the South Warwickshire Housing and Economic Land Availability Assessment (HELAA) to assess their availability, suitability and viability for development. Additionally, an Infrastructure Delivery Strategy and associated viability assessments will be undertaken as the Local Plan progresses to ensure that what is put forward as a preferred development strategy is both deliverable and viable.

Q-I5: Please add any comments you wish to make about infrastructure, viability and deliverability

4.2 Development distribution strategy for South Warwickshire

This Part One Local Plan needs to identify the overarching development strategy for the delivery of the required growth across South Warwickshire in a way that satisfies the vision and objectives of the Plan, and this strategy will then act as a framework for subsequent plans and strategies and inform the determination of planning applications for new development. Whilst it is anticipated that this Part One Plan will set out the development principles and associated infrastructure requirements for the broad locations that are identified, it is expected that Part 2 Plans (for example Area Action Plans, Masterplans, topic-based Development Plan Documents) will provide more detail on these strategic locations and also set out the development principles and detail on the more non-strategic locations identified for growth.

A Topic Paper setting out the evolution of the Spatial Growth Options to date is available on our website here [“Evolving the Spatial Growth Options – the story so far”](#).

A range of factors need to be considered to identify a suitable pattern of growth as each will influence the overall strategy:

- Green & Blue Corridors
- Making efficient use of land
- Using Brownfield Land for Development
- The potential for new settlement(s)
- Growth of existing settlements
- A review of Green Belt boundaries

Issue S1: Green & Blue Corridors

What you said:

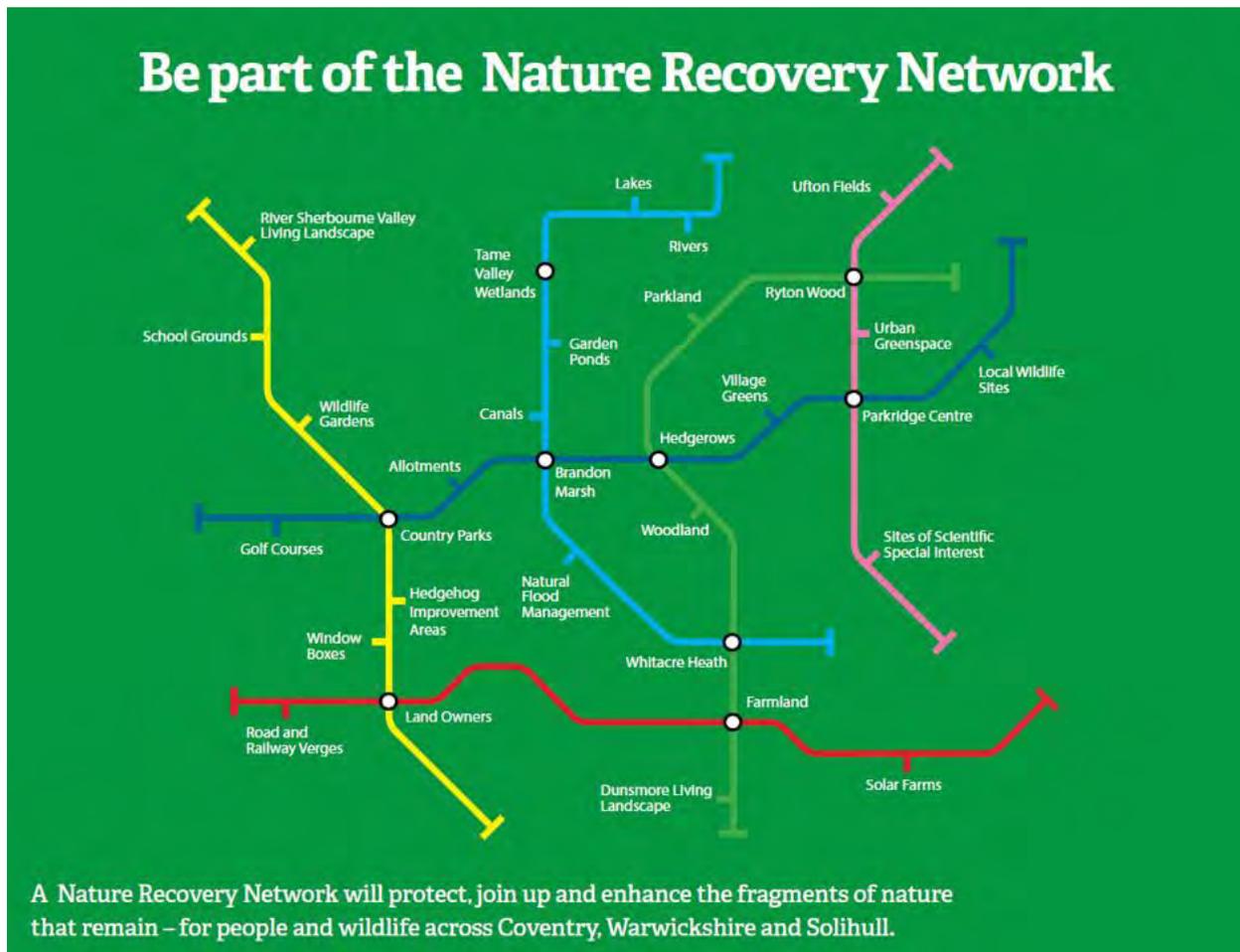
- Overwhelming support for the protection and enhancement of our green areas and associated habitat/biodiversity. However, it was acknowledged that a balance needs to be struck between the need for development and the protection of the local environment
- Ancient woodland should be protected and retained and there was support for the planting of trees
- Green open space and woodland should be easily accessible to the local community as they provide a valuable asset for health and wellbeing, as well as benefits for nature.
- Policies should have regard and be in line with any relevant, existing and forthcoming national policies

Green & blue infrastructure is an important aspect of planning for many reasons, and protecting and enhancing existing networks, as well as creating new ones are high on the agenda, especially following the release of the Governments 25 Year Environment Plan and the new Environment Act, both of which aim to halt nature's decline and to support its recovery.

Green Infrastructure, as defined within the NPPF, is *'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity'*. Green & blue Infrastructure can be incorporated into development at varying scales and in many forms, such as through the planting of street trees, creating parks, providing private gardens, allotments, sustainable urban drainage systems, wildlife areas, woodlands, natural flood management schemes, hedgerows, field margins and waterways, to name a few. Used in conjunction these can all help improve the provision of green & blue infrastructure across the plan area and create a Nature Recovery Network (Figure 7), resulting in benefits for people, nature and the climate. The SWLP will address the incorporation of green & blue Infrastructure assets in development as the plan progresses, and it is likely that there will be a separate policy on green infrastructure within Part 2 of the South Warwickshire Local Plan. However, this section focuses on the creation of a strategic green & blue infrastructure network primarily for wildlife, one that seeks to improve the biodiversity of the area, supports nature's recovery and allows wildlife to travel across large areas.

Designated natural assets, including Sites of Special Scientific Interest, Local Wildlife Sites, Ancient Woodland and Local Nature Reserves, as well as non-designated assets such as woodlands/forests, river networks, and country parks, can all contribute to a strategic green corridor network. However, these assets and areas may not link together in a way that allows wildlife to travel between them, and in order to create a biodiverse and environmentally resilient South Warwickshire this is something the South Warwickshire Local Plan will need to address.

Figure 7 – The Wildlife Trusts’ Nature Recovery Network illustrative diagram



On a regional scale, in accordance with the new Environment Act, the production of a Local Nature Recovery Strategy will help South Warwickshire plan, map and act, in a way that supports this. However, it is likely to be many years before a finalised Nature Recovery Strategy is in place, and it would likely be adopted after the SWLP growth strategy has been determined. With the emphasis on the climate emergency and increasing biodiversity, it is important that the SWLP growth strategy supports nature's recovery as best it can, and does not detrimentally impact some of the key natural assets across the area. As such, it is proposed that the SWLP takes a proactive approach and seeks to identify its own 'Green Corridors' across the plan area in advance of the Local Nature Recovery Strategy, so that they can inform the growth strategy. Establishing a network of green corridors at this stage of the plan making process will help determine a growth strategy that increases biodiversity and supports nature's recovery.

[Local Nature Recovery Strategies](#) are a new system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature's recovery and provide environmental benefits.

In advance of a Local Nature Recovery Strategy being created the existing [Warwickshire Coventry and Solihull Sub-regional green infrastructure study](#) (2013) can be used to inform green infrastructure policies, and the creation of a green & blue infrastructure network. An update to this study is scheduled and is anticipated to take place within the next few years, however, the information within the existing study is still valuable and can be used alongside additional evidence to help determine where Green Corridors across the plan area could go.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.5	44	As part of the Landscape policy, the Core Strategy seeks to protect the quality of ancient semi-natural woodland and aged/veteran trees, and where proposals affect trees and hedgerows measures are taken to protect their contribution to landscape character, public amenity and biodiversity. Where appropriate trees are included in development schemes and opportunities are taken to expand native woodlands and to buffer/extend/connect fragmented ancient woodlands. Woodlands planted to reduce flood risk, and help climate change adaptation are also encouraged.
Stratford-on-Avon District Core Strategy	CS.6	48	Development is expected to contribute towards a resilient ecological network, support ecosystems and provide ecological security for wildlife, people, the economy and tourism. Proposals will be expected to minimise impacts on biodiversity and where possible secure a biodiversity net gain through measures such as safeguarding and enhancing existing habitats, and making provision for additional habitats, helping strengthen networks and addressing the priorities of the Biodiversity Action Plan.
Stratford-on-Avon District Core Strategy	CS.7	53	The existing green infrastructure network will be promoted through the principles of protection, enhancement, restoration and creation, and new development proposals must demonstrate their contribution to the green infrastructure network. Open spaces, waterways and other green infrastructure features will be maintained and improved, and access to these features will be provided.
Warwick District Local Plan	HS6	99	Development proposals are required to provide access to high quality and safe green or open spaces.
Warwick District Local Plan	NE1	117	The Council will protect, enhance and restore the district’s green infrastructure assets and strive for a healthy integrated network for the benefit of nature, people and the economy. Working with partners the council will protect and enhance existing habitats, as well as restoring fragmented areas, ensure access to natural green space and make improvement to landscape character.
Warwick District Local Plan	NE2	118	The Council will protect designated areas and species of national and local importance for biodiversity and geodiversity such as Sites of Special Scientific Interest (SSSIs) Ancient Woodland, aged and veteran trees, Local Nature Reserves and Local Wildlife Sites
Warwick District Local Plan	NE4	120	New development will be permitted that positively contributes to landscape character. Development proposals will be required to demonstrate that they: g) address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing these features through means such as buffering and reconnecting fragmented areas;

Q-S1: Please select the option which is most appropriate for South Warwickshire

Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced

Utilising Information from the soon to be updated, Sub-Regional Green Infrastructure Strategy and additional evidence obtained in consultation with Green Infrastructure Stakeholders, should the South Warwickshire Local Plan identify Green Infrastructure corridors which can be used to help determine the growth strategy.

Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy

Instead of identifying Green and Blue Corridors within the South Warwickshire Local Plan, this option will rely on the production of the Local Nature Recovery Strategy. The production of a Local Nature Recovery Strategy will likely come after the SWLP Spatial Growth Strategy has been determined, therefore it is likely that there will be a reduced synergy.

Issue S2: Intensification

Density relates to how much built development there is in a given area. It plays an important role in determining how a place looks and functions, and the extent to which it contributes towards the long-term sustainability of the site, locality and the wider area. National policy requires planning policies to promote an effective use of land in meeting the development needs of an area.

The SWLP team have produced a **density guide** which illustrates typical housing densities found within the South Warwickshire Area.

Increasing the number of homes within existing urban areas is known as ‘intensification’ or ‘densification’.

You told us:

There was strong support for intensification as it supports the re-use of brownfield land and is strongly encouraged by national policy. It provides a number of benefits such as tackling climate change, reducing travel and promoting active travel.

Most respondents felt that intensification shouldn’t be considered in isolation as it wouldn’t meet the need for new growth alone and there is a potential impact on the environment and heritage assets that would need to be considered.

There was some suggestion that there should not be a blanket approach across South Warwickshire as densities should be different in urban and rural areas, and that the individual location should determine the appropriate density taking into account the identified need, local market conditions, viability and the availability of transport and other infrastructure and services.

There was some suggestion that there should be minimum density standards for the area outside of town centres and there may need to be a range of densities to reflect individual areas.

Reference was made to the importance of design in high density development to maintain existing character and ensure high quality development. Space standards are also an important consideration.

Intensification of existing urban areas can have a positive impact on the sustainability of the settlement by:

- Positioning dwellings close to existing jobs and services, creating walkable neighbourhoods
- Improving the viability of public transport
- Improving the viability of existing town centres and the services within them
- Reducing the need for ‘greenfield’ land for development

Intensification also has an important role to play in tackling climate change both in relation to reducing carbon emissions and creating places that are more resilient to the effects of climate change. It can reduce reliance on the private car by making destinations more easily accessible by walking or cycling. This brings together higher concentrations of people to support local public transport and other services and facilities, thereby reducing the need to travel and shifting travel onto low-carbon modes. Additionally, higher density developments can often achieve higher levels of energy efficiency by improving the viability of decentralised energy schemes.

Well-designed intensification recognises and draws on the existing strengths and heritage of an area. When done well, intensification can have a positive impact on the appearance and vitality of a neighbourhood. Building at higher densities can often deliver higher quality developments, although it is often associated with negative perceptions from examples of poor urban design. Density is just one aspect of built form; building height, block size and building typology will all affect the character and the perceptions of density.

Intensification can be achieved in a number of number of ways, for example:

- Re-using brownfield sites
- Conversion of upper floors of buildings to residential use
- Additional storeys on buildings
- Re-using empty homes
- Infill in residential areas, e.g. filling gaps in the street frontage, developing disused garage blocks, car parks
- Mews dwellings on service roads

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.20	115	Subdivision of dwellings and conversions to residential use supported in principle. Provision of flats above shops supported in principle.
Warwick District Local Plan	TC3	46	Within town centre retail areas, changes of use from retail to other uses not permitted (including on upper floors)
Warwick District Local Plan	TC14	52	Within town centres, changes of use from residential to other uses not permitted on upper floors

Q-S2: Please select all options which are appropriate for South Warwickshire

Option S2a: Identify areas considered particularly suited to intensification development, and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.

Considering whether an area is particularly suited to intensification is likely to take into account a number of factors. These could include proximity to services (for example, streets within half a mile of a town centre or train station); and the existing built form and character of an area. Identifying areas in this way is likely to encourage intensification developments to take place, and a design code would ensure that such developments make a positive contribution to the neighbourhood.

Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes

In this option, the policy would apply across the whole of the South Warwickshire area. Design codes could still be drawn up for individual character areas, but it would also be prudent to have a more generic intensification design code that applied everywhere else. It may be difficult for this more generic design code to direct the most appropriate forms of intensification across a wide range of localities and architectural styles.

Option S2c: Do not have a policy which encourages intensification

This option is likely to mean that fewer intensification schemes come forward, so some land in sustainable locations would remain under-utilised, and resulting in a greater requirement for housing developments on greenfield land. Without a design code, applicants may find it harder to know what would be acceptable in planning terms, and the quality of intensification schemes coming forward may be lower.

Issue S3: Using Brownfield Land for development

Brownfield land is that which has been previously developed. Reusing suitable brownfield land for new development can provide an effective use of land and reduces the need for development on previously undeveloped greenfield sites. National policy places great emphasis on the efficient use of urban land – it is a key component of sustainable development and can help to tackle the climate emergency. Identifying the potential of existing urban areas to accommodate additional residential development is an important component of the growth strategy for South Warwickshire.

Brownfield Land suitable for redevelopment could consist of industrial estates that have fallen out of use, buildings that have fallen into disrepair, or simply parcels of already developed land that could be used in a more efficient way. Small parcels of brownfield land are most commonly found within existing built-up areas, however sometimes large areas of rural brownfield land, such as airfields in the countryside, can become available. In some instances, redeveloping brownfield land, means clearing the site of existing buildings, however, sometimes the most efficient and most climate friendly approach is to incorporate existing buildings into new development proposals so that they can be reused, repurposed and retrofitted to achieve net zero carbon requirements.

What you said:

- Support for directing development to brownfield sites as these locations are likely to have infrastructure in place and can also be suitable locations for densification, which has sustainability benefits. Such an approach also reduces the need to develop greenfield land. It was however acknowledged that there may be costs for remediation works and this may have impacts on viability.
- Concern that the loss of businesses on brownfield land, due to housing redevelopment, can affect SMEs by raising costs.
- Concerns that brownfield sites may struggle to provide green infrastructure (e.g green open spaces & trees) due to site constraints, and blanket approaches can often impede development.

An [Urban Capacity Study](#) for South Warwickshire has recently been undertaken to inform the Local Plan. Its purpose is to identify the potential for residential development on brownfield land within the settlements in South Warwickshire that have been identified as the most sustainable in terms of access to services and facilities in the existing adopted Stratford Core Strategy and Warwick Local Plan.

The study has been undertaken as a theoretical exercise and is not intended to conclusively establish the urban capacity of South Warwickshire over the period to 2050, but rather to indicate potential untapped urban capacity within these identified settlements, subject to the application of policy and the conclusions of more detailed subsequent evidence work. The Study does not consider the implications on existing infrastructure, for example education, health, transport. More detailed assessments of the individual sites will need to be undertaken to consider their suitability and deliverability, along with the effect on existing infrastructure and whether any negative impacts can be appropriately mitigated for, such as the provision of additional infrastructure.

Q-S3.1: Please add any comments you wish to make about the Urban Capacity Study

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	AS.11	199	Prioritise re-use of brownfield land. Small scale brownfield redevelopment is encouraged in line with AS.10 Countryside and Villages. Redevelopment of large rural brownfield sites are also encouraged outside the green belt however, a number of factors need to be considered to minimise any adverse impacts. This includes: making sure development is in the local/national interest, whether there is a more suitable location in line with the development strategy, whether development would be an improvement on the current use, the scale and nature of the impacts on the local area, any statutorily protected features, ability to support sustainable travel and any areas of flood risks.
Warwick District Local Plan	DS10	21	The spatial strategy seeks to maximise the use of brownfield sites, with nearly 9% of allocated housing sites utilising Urban Brownfield land.

Q-S3.2: Please select the option which is most appropriate for South Warwickshire

Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.

Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development.

Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location

This option looks to prioritise the redevelopment of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.

Option S3.2c: None of these

Issue S4: Growth of existing settlements

South Warwickshire has a dispersed settlement pattern and is home to a significant number of existing settlements of varying sizes. There are nine towns (Alcester, Henley-in-Arden, Kenilworth, Royal Leamington Spa, Shipston-on-Stour, Southam, Stratford-upon-Avon, Warwick and Whitnash), at least 82 villages and hundreds of hamlets.

The South Warwickshire Local Plan will seek to maximise the capacity of its existing urban areas in order to meet our development needs to 2050 (see [Issue S2](#)). However, in deciding upon the best distribution strategy for new development within South Warwickshire it is important for the Local Plan to consider the potential for growth around the edges of the existing settlements, potentially alongside and in combination with other options such as new settlements (see [Issue S5](#)).

South Warwickshire’s existing towns and villages provide varying levels of services and facilities to meet the needs of the people who live or work in and around them. Some of the larger settlements act as a hub for surrounding smaller villages. The facilities available can range from healthcare, education, leisure & recreation, retail, jobs and places to meet, and how well located they are to public transport options. [Chapter 10 Issue T1](#) highlights the benefits of the 20-minute neighbourhood principle whereby people are able to meet their regular day to day needs within reasonable walking distance of their home or workplace. The 20 minutes relates to a 10-minute walk to the facility and then a 10-minute walk back. This concept very much follows the objective of sustainable development and aligns with the overarching principles of this Local Plan.

In rural areas, the implementation of the 20-minute neighbourhood poses a different set of challenges, including poor broadband and mobile phone coverage, inferior public transport provision and road transport, and a poor variety of employment opportunities. Housing affordability and isolation from and access to services are other issues facing many rural areas. There are two possible approaches to these rural settlements:

- Market Towns of sufficient size to become a complete and compact 20-minute neighbourhood, where people from nearby villages would need to travel to the town to use its services to find most of what they need for everyday life rather than having to travel to several different places. This is a concept that could be taken forward in Neighbourhood Development Plans.
- Areas with small villages and no towns could create a network of villages that collectively provide what most people need for their daily lives, joined by active travel arrangements.

In order to understand the situation within our existing settlements as to whether there is potential for new development to help deliver the advantages of a 20-minute neighbourhood, [a settlement analysis evidence base](#) [ADD LINK](#) has been developed to help us identify the opportunities and constraints to growth in and around the edges of the following settlements and locations across South Warwickshire. These have been selected based on their status in the existing Local Plans and those that falls within certain growth options.

Table 2 – List of settlements and locations subject to connectivity, accessibility and density analysis

Alcester	Hatton Station	South of Coventry
Barford	Henley-in-Arden	Southam
Bearley	Kenilworth	Stratford-upon-Avon
Bidford-on-Avon	Kineton	Studley

Bishop’s Tachbrook	Kingswood (Lapworth)	Warwick
Claverdon	Long Itchington	Wellesbourne
Cubbington	Radford Semele	Whitnash
Earlswood	Royal Leamington Spa	Wilmcote
Hampton Magna	Salford Priors	Wood End
Hatton Park	Shipston-on-Stour	Wootton Wawen

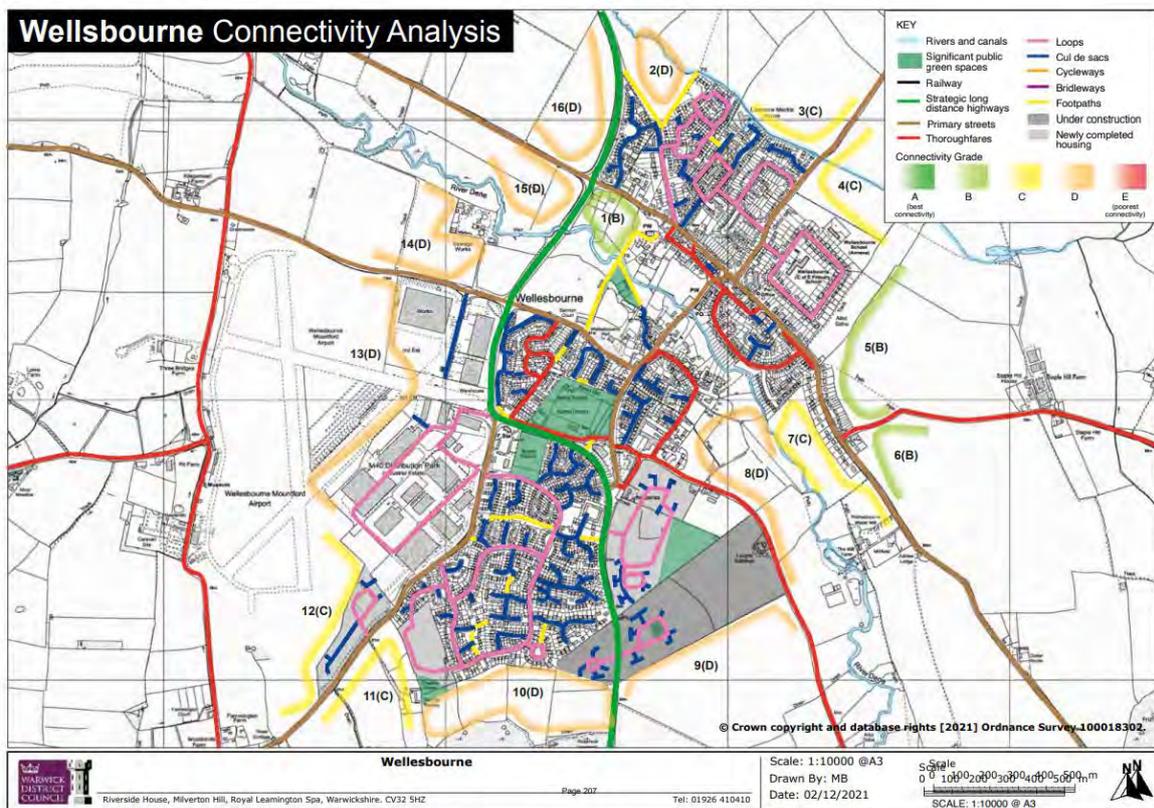
Whilst acknowledging that there are other factors to be considered in relation to the potential for growth that are outside the scope of this specific study, the analysis provides a useful assessment of:

- Connectivity – the physical connectivity of the existing street pattern, and any physical barriers which limit route/connection options, including green & blue infrastructure.
- Accessibility – this element focuses on the proximity/distance to key facilities and services
- Density – an analysis of the density ranges within the settlement

Connectivity Analysis

The streets and other connectors (e.g. footpaths) have been considered and categorised/mapped as in the example in figure 8 below. These categories suggest the extent to which the route is connected to others within the network. For example, a cul de sac (blue) is only connected at one end to another street, and is therefore less connective than a primary street (brown). This mapped analysis gives an overall illustration of connectivity within the settlement as a whole.

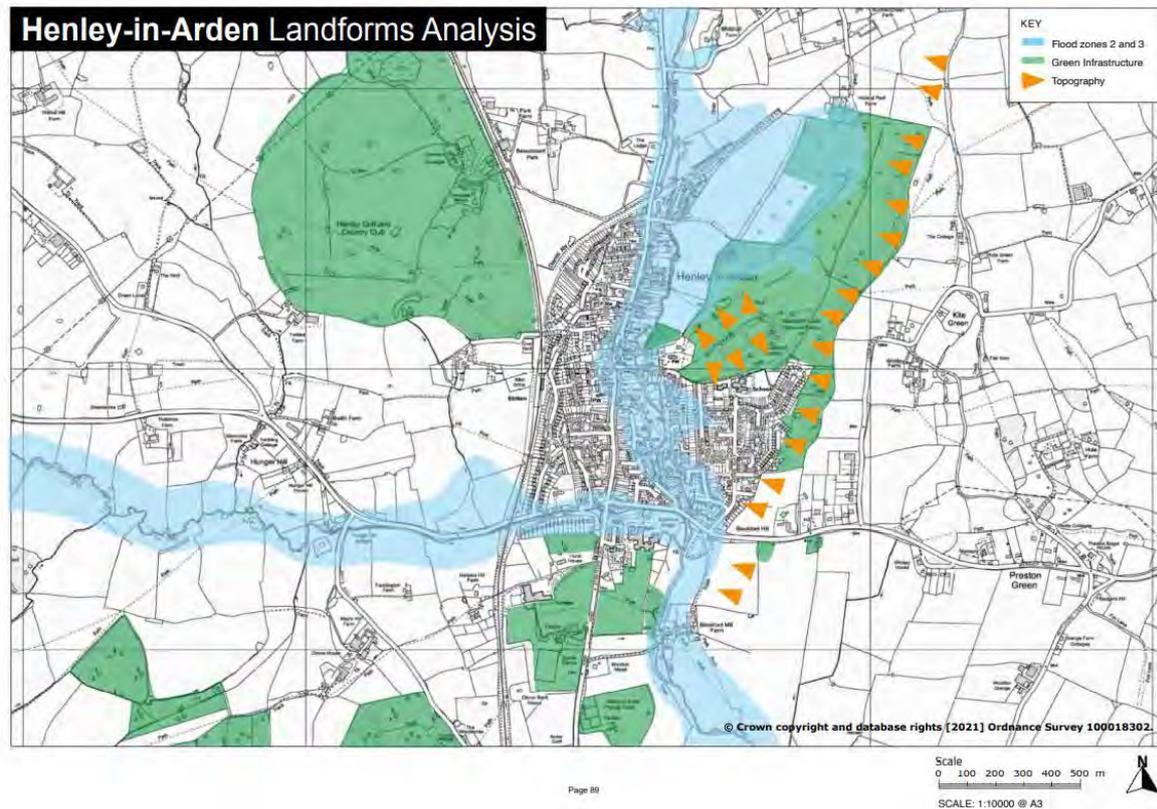
Figure 8 – Example Settlement Connectivity Analysis – Wellesbourne



Landform Analysis

Landform analysis principally considers the location and form of green infrastructure, flood zones, and notable slopes/topography. All of these elements potentially pose opportunities or constraints to how people can move around a settlement, and linked to that, how a settlement might grow. Figure 9 below is an example of landform analysis.

Figure 9 – Example Settlement Landforms analysis – Henley-in-Arden

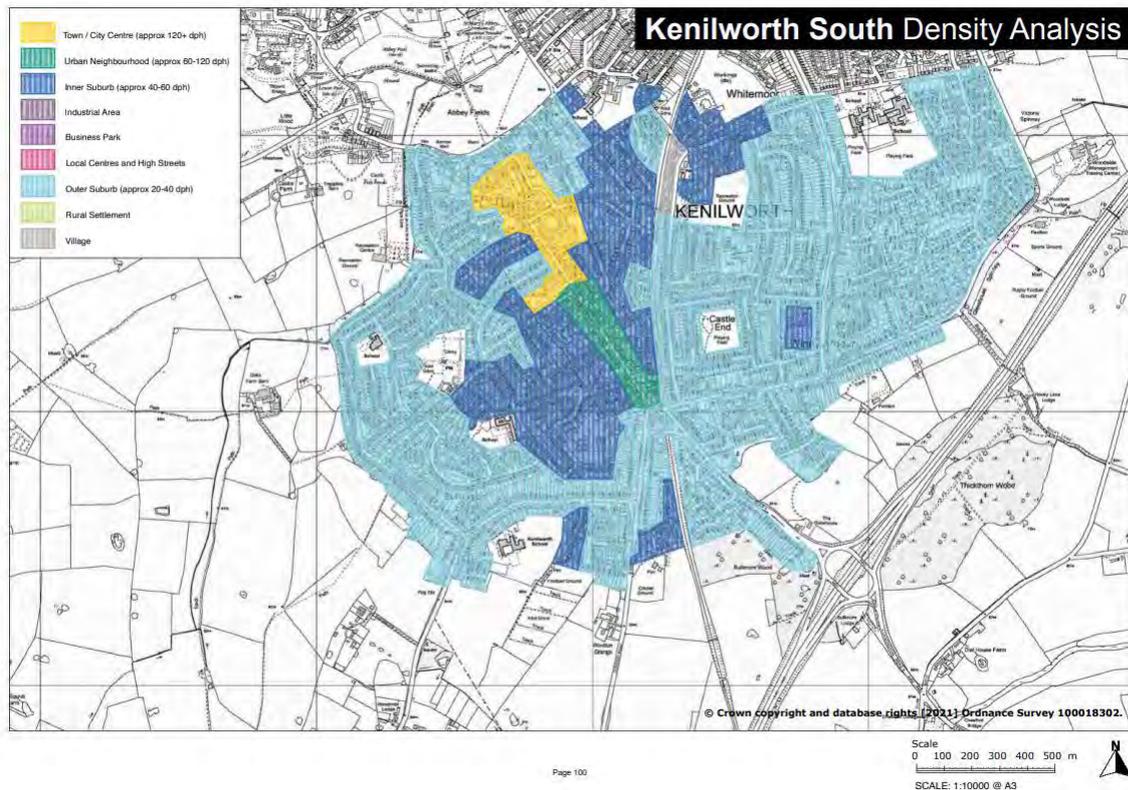


Density Analysis

The density analysis gives an indication of the prevailing densities across different settlements. These could inform assumptions about typical density ranges that may be appropriately be applied to any growth in the locality if relevant to spatial options, and therefore the approximate capacity of different areas of land.

For the purposes of this work (e.g. figure 10), precise densities were not calculated for each area, rather areas were defined through officer observation and a judgement of the ‘best fit’ within the density range definitions in the [National Model Design Code](#) (p13-14).

Figure 10 – Example Settlement Density analysis – Kenilworth South



Sustainability Appraisal (SA)

To help ensure that the Local Plan includes the most suitable planning policies and development allocations, the SA identifies, describes and evaluates a number of different reasonable alternative policies and development locations. Further information on the SA and a question to provide any comments on can be found in [Section 4.1](#).

Included within the SA is an exploration of a number of alternative options, including those that involve the growth of existing settlements:

- **32 Broad Locations** which represents options for up to 2,000 homes located around the main settlements for medium scale development and associated infrastructure in any one Broad Location
- **22 Small Settlement locations** for intermediate scale development for between 50-500 homes in any one location, typically associated with smaller settlements and villages

Details of the SA assessments of these locations can be found in section 4 and appendix B (Broad Locations) and section 5 and appendix C (Small Settlements) of the SA [here](#).

Heritage and Settlement Sensitivity Assessment

In addition to the above analysis, a [Heritage and Settlement Sensitivity assessment](#) has been undertaken for the same settlements across South Warwickshire that assesses the sensitivity to new development on the existing heritage and landscape character. The purpose of the study is to gain an understanding of each settlement’s historic and landscape value, sensitivity, opportunities for enhancement and capacity to accommodate new development around the edge of the existing settlement. The assessment uses a Red Amber Green (RAG) rating to provide recommendations on

the edges of the settlements. An example of the assessment for the settlement of Barford is presented in Figure 11.

Figure 11 – Example Heritage and Settlement Sensitivity assessment – Barford

Settlement	Location	RAG score	Notes
Barford	North-west	Red	Area to the north of the River Avon, including the Sherbourne conservation area, Scheduled Monuments and non-designated heritage assets are highly sensitive to change and there is no scope for large-scale development in this area
Barford	North-east	Yellow	Barford Conservation Area and the non-designated heritage assets are sensitive to change, but there may be scope for carefully considered development in this area subject to appropriate mitigation
Barford	South-east	Green	There may be scope for development subject to appropriate mitigation of the impact on the setting of the Conservation Area boundary and the Listed Building
Barford	South-west	Yellow	Sherbourne Conservation Area, two Listed Buildings and the non-designated heritage assets are sensitive to change, but there may be scope for carefully considered development subject to appropriate mitigation

Q-S4.1: Do you think that growth of some of our existing settlements should be part of the overall strategy? Y/N/DK

Q-S4.2: Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on

Issue S5: The potential for new settlement(s)

What you said:

37% of respondents supported the principle of new settlements, whilst 27% were against. The remainder were indifferent.

Reasons for support: potential to ensure infrastructure is provided in a timely manner, and potential to locate them near existing transport infrastructure

Reasons for not supporting new settlements included timing of delivery/commencement and slow build outs

New settlements can be an effective and sustainable way of meeting the challenges of delivering high-levels of housing growth. Whilst it is acknowledged that large-scale development will transform the landscape of the specific area in which it is built, it provides many benefits including a range of new community, employment, and leisure services. At the same time, focusing significant development in new locations can relieve pressure on other areas thus helping to retain their special character and qualities. Many of these places are our existing larger villages and historic market towns. An added benefit is that because of their scale, necessary infrastructure and employment premises can be built in from the beginning helping to ensure that they create or contribute to sustainable communities as well as ensuring a holistic approach when it comes to infrastructure delivery.

New Settlements are one of several options being considered to deliver the necessary growth required over the plan period.

Regarding timescales, one of the benefits of having a plan that runs to 2050 is that it provides adequate time for a new settlement to come on stream.

For a new settlement to be considered, it is imperative to establish the minimum number of homes necessary to deliver and sustain new infrastructure and ensure a viable development, from both a financial and community perspective. Discussions with infrastructure and service providers are ongoing but initial feedback has provided the following thresholds for three key facilities as set out in Table 3. Other facilities and services would be provided onsite. These figures are minimum figures and the likeliness is that there will need to be a greater number of homes to ensure that new settlements are viable and can sustain new infrastructure.

Table 3 – Infrastructure thresholds

Infrastructure	Threshold
Primary School	1,000 – 2,000 homes
Secondary School	4,000 – 5,000 homes
Railway Station	6,000 homes

Based on a net density of 40 dwellings per hectare and taking into account the need for land for open space, schools, employment and retail, the area of land required would be in excess of 250 hectares, equivalent to over 600 football pitches.

In order to narrow down the search for potential locations, the following two-part methodology has been devised.

Part 1 – Identifying Areas of Search

Given the climate change emergency, as a starting point we think it is right to start the search for a new settlement in locations that have or could have (subject to further detailed discussions with rail operators) easy access to rail services.

We have split the South Warwickshire rail network into seven areas of search labelled A-G as shown on Map 1. The seven areas are simply based on the rail corridors outside of existing urban areas.

Part 2 – Identifying Potential Locations

A very high-level initial assessment has been undertaken of the seven areas of search encompassing the following considerations:

- Green Belt
- Conservation Areas
- Special Landscape Areas
- Ancient Woodland
- Sites of Special Scientific Interest
- Railway Stations
- Strategic Road Network
- Coalescence

Within the seven Areas of Search, seven potential locations have been identified. A summary of this assessment is shown in Table 4. Two Areas of Search (D and G) do not contain any potential locations.

It should be stressed that in order to take forward any potential location, further detailed assessment is required. This assessment would include any major constraints and consider possible mitigation and will take place following the Issues and Options consultation. There is the possibility that once these detailed assessments have taken place and in light of any comments received to the Issues and Options consultation, none of the potential locations are deemed suitable.

Sustainability Appraisal (SA)

To help ensure that the Local Plan includes the most suitable planning policies and development allocations, the SA identifies, describes and evaluates a number of different reasonable alternative policies and development locations. Further information on the SA and a question to provide any comments on can be found in [Section 4.1](#).

Included within the SA is an exploration of a number of alternative options, including those that involve the potential locations for new settlements.

Table 4 – High level sustainability appraisal of New Settlement Locations

New Settlements	A1	B1	C1	E1	F1	F2	F3
SA Objective 1 Climate change	--	--	--	--	--	--	--
Objective 2 Flood risk	+	+	+	-	+	-	-
Objective 3 Biodiversity	--	-	--	--	--	--	--
Objective 4 Landscape	--	-	-	-	-	--	-
Objective 5 Cultural Heritage	--	--	--	0	--	--	-
Objective 6 Pollution	-	-	-	-	-	-	-
Objective 7 Natural Resources	--	--	--	--	--	--	--
Objective 8 Waste	--	--	--	--	--	--	--
Objective 9 Housing	++	++	++	++	++	++	++
Objective 10 Health	-	-	-	-	-	-	-
Objective 11 Accessibility	-	-	-	-	-	-	-
Objective 12 Education	-	-	-	-	-	-	-
Objective 13 Economy	+	+	+	+	+	+	+

Details of the SA assessments of these locations can be found in section 6 and appendix D [here](#).

Climate Change Emissions Estimation

As part of the evidence to inform the Local Plan an operational carbon model has been developed to assess carbon emissions at a strategic level and test how the development of the seven potential new settlement locations performs against each other. Each option is modelled as a scenario where various levers and inputs reflect different policy and design decisions and changes in the market. The model is based on current Government and existing Local Plan policies and the results of the scenario modelling give a better understanding of which levers will have the greatest impact on future carbon emissions of each growth option.

The model has been built in a flexible madder to allow more detailed data to be easily added at future stages of the preparation of the Local Plan. This could include additional site specific information, emerging policy direction at each stage of the Plan and other or updated sources of information such as further data released from Census 2021 – like travel mode split.

Table 5 shows the cumulative and year on year annual emissions for the seven potential new settlement options. This analysis highlights the critical importance of the growth options in terms of estimating overall carbon emissions for new settlements, with those within growth option 4 - Sustainable Travel & Economy generally performing better in terms of reduced carbon emissions. Overall, this provides a useful overview and starting point to consider refining options, with the potential for future policies to deliver wider carbon benefits to the development of these new settlements across all the growth areas. Further information on the Estimation of Emissions study is available to view [here](#).

Table 5 – New settlements location and summary emissions estimations

Location	New Settlement Reference	Growth Options considered	Cumulative emissions in 2050 (tCO ₂ e)	Annual emissions in 2050 (tCO ₂ e)
Henley-in-Arden	A1	2 – Sustainable Travel	440,000	2,500
		3 – Economy	446,000	2,500
		4 – Sustainable Travel & Economy	432,000	2,400
Hatton Station	B1	1 – Rail Corridors	437,000	2,500
		2 – Sustainable Travel	440,000	2,500
		4 – Sustainable Travel & Economy	432,000	2,400
Kingswood	C1	1 – Rail Corridors	437,000	2,500
Depper’s Bridge	F2	1 – Rail Corridors	437,000	2,500
		2 – Sustainable Travel	440,000	2,500
		4 – Sustainable Travel & Economy	432,000	2,400
Long Marston Airfield / Meon Vale	E1	1 – Rail Corridors	437,000	2,500
		2 – Sustainable Travel	440,000	2,500
		3 - Economy	446,000	2,500
		4 – Sustainable Travel & Economy	432,000	2,400
		5 - Dispersed	464,000	2,700
Wood End	F1	1 – Rail Corridors	437,000	2,500
		3 - Economy	446,000	2,500
GLH Gaydon / Lighthorne Heath	F3	3 - Economy	446,000	2,500
		4 – Sustainable Travel & Economy	432,000	2,400

Q-S5.1: Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options?

Figure 12 – Potential locations for new settlements

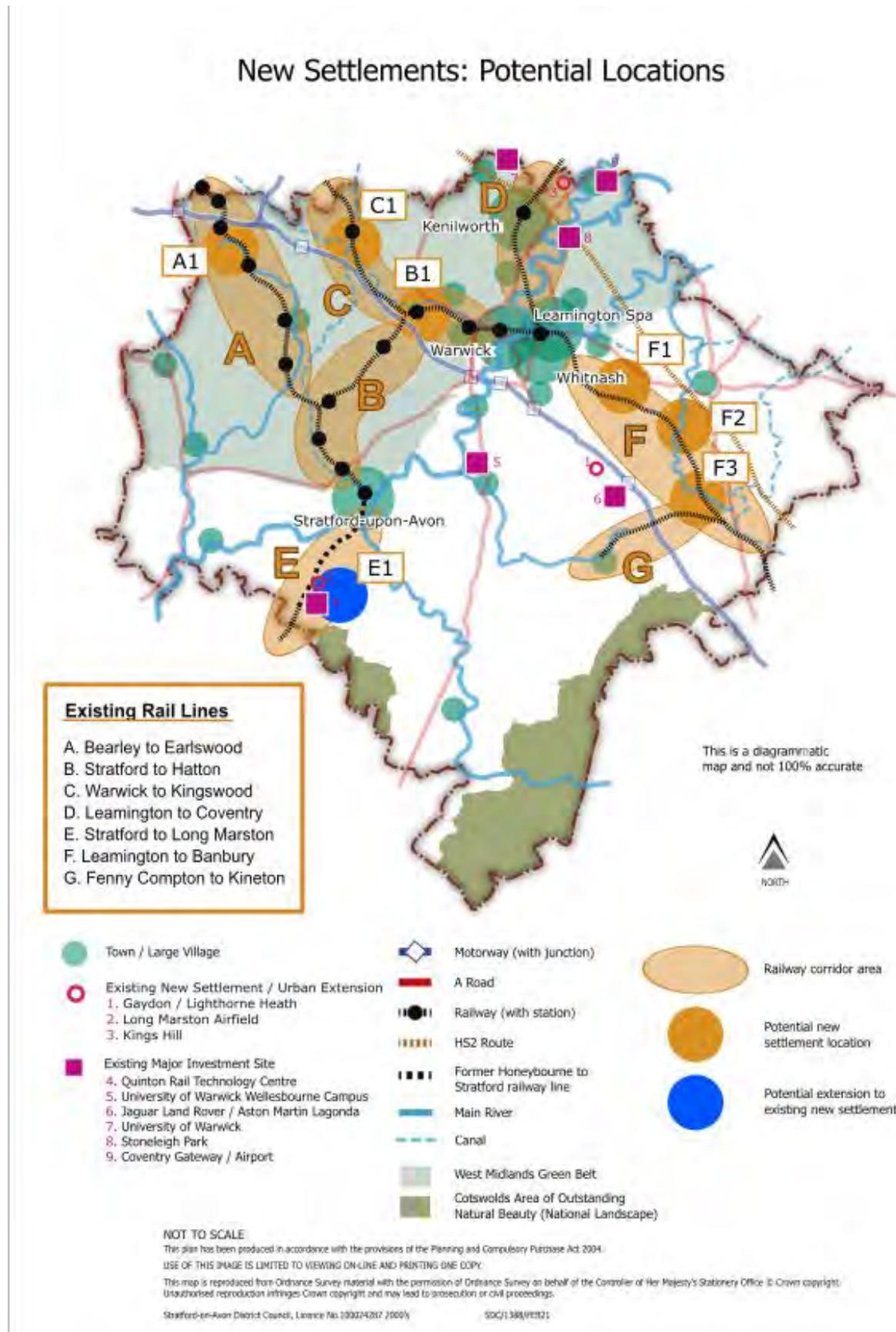


Table 6 – Summary of potential locations for a new settlement

Potential location	Green Belt	Conservation Area	Special Landscape Area	Ancient Woodland	SSSI	Existing railway station	Would require new railway line/station	SRN (Strategic Road Network)	Would this result in coalescence with existing settlements?
A1	√	√ (part)	√	√ (part)	×	√ (Wood End) √ (Danzey Green)	×	Western part of site adjacent to A435 connecting to M42.	√
B1	√	×	×	√	×	√ (Hatton)	×	M40 to the west of proposed area and A4177 to the north.	√
C1	√	×	×	×	×	√ (Lapworth)	×	M40 to the south of proposed area.	√
D	-	-	-	-	×	-	-	-	-
E1	×	×	×	×	×	×	√ (new line + new station)	B4632 runs through part of the proposed area. (Approx. 7 miles to the A46).	√
F1	×	×	×	√ (area to north east of proposed area)	One to the east and one to the south	×	√ (new station)	Fosse Way runs to the west of proposed	√

Chapter 4 –Meeting South Warwickshire’s Sustainable Development Needs

Potential location	Green Belt	Conservation Area	Special Landscape Area	Ancient Woodland	SSSI	Existing railway station	Would require new railway line/station	SRN (Strategic Road Network)	Would this result in coalescence with existing settlements?
					of proposed area			area. (M40 Junction 12 approx. 4 miles away).	
F2	x	x	x	Area to south east of the proposed area.	x	x	√ (Would require a new station complete with accompanying railway and access infrastructure)	B4451 runs to the north of the proposed area. M40 approx. 3 miles away.	√
F3			√	Area to the north	x	x	√ (Would require a new station complete with accompanying railway and access infrastructure)	B4100 runs to the eastern edge of the site. Nearest junction to M40 would be 12 at Gaydon (approx. 4 miles away).	√
G	-	-	-	-		-	-	-	-

Q-S5.2: Do you think new settlements should be part of the overall strategy?

Y/N/DK

Q-S5.3: In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree? Y/N/DK

Q-S5.4: If not, what approach would you take?

Issue S6: A review of Green Belt boundaries

What you said:

54% of respondents supported the exploration of growth opportunities in the Green Belt, with 31% against and the remaining 15% commenting without giving an overall view.

Main reasons given for support:

- Opportunity for provision of affordable housing in Green Belt settlements
- Enables growth to have adequate provision of supporting infrastructure
- There is demand from growth in the economy and the population
- Opportunity to focus on development sites which do not harm the green belt
- Opportunity to create sustainable patterns of development
- The large extent and tightness of the existing designation
- Length of time since the green belt was established and need to be revised
- Suggested by the Greater Birmingham and Black Country HMA Strategic Growth Study 2018
- Varied ecological and landscape value in some green belt areas not worthy of protection
- Need a blended approach to growth
- Opportunity to focus growth adjacent to existing settlements in the green belt
- Enables focussed assessment of the green belt for the five purposes
- Plan needs to be underpinned by a comprehensive green belt review in line with the NPPF

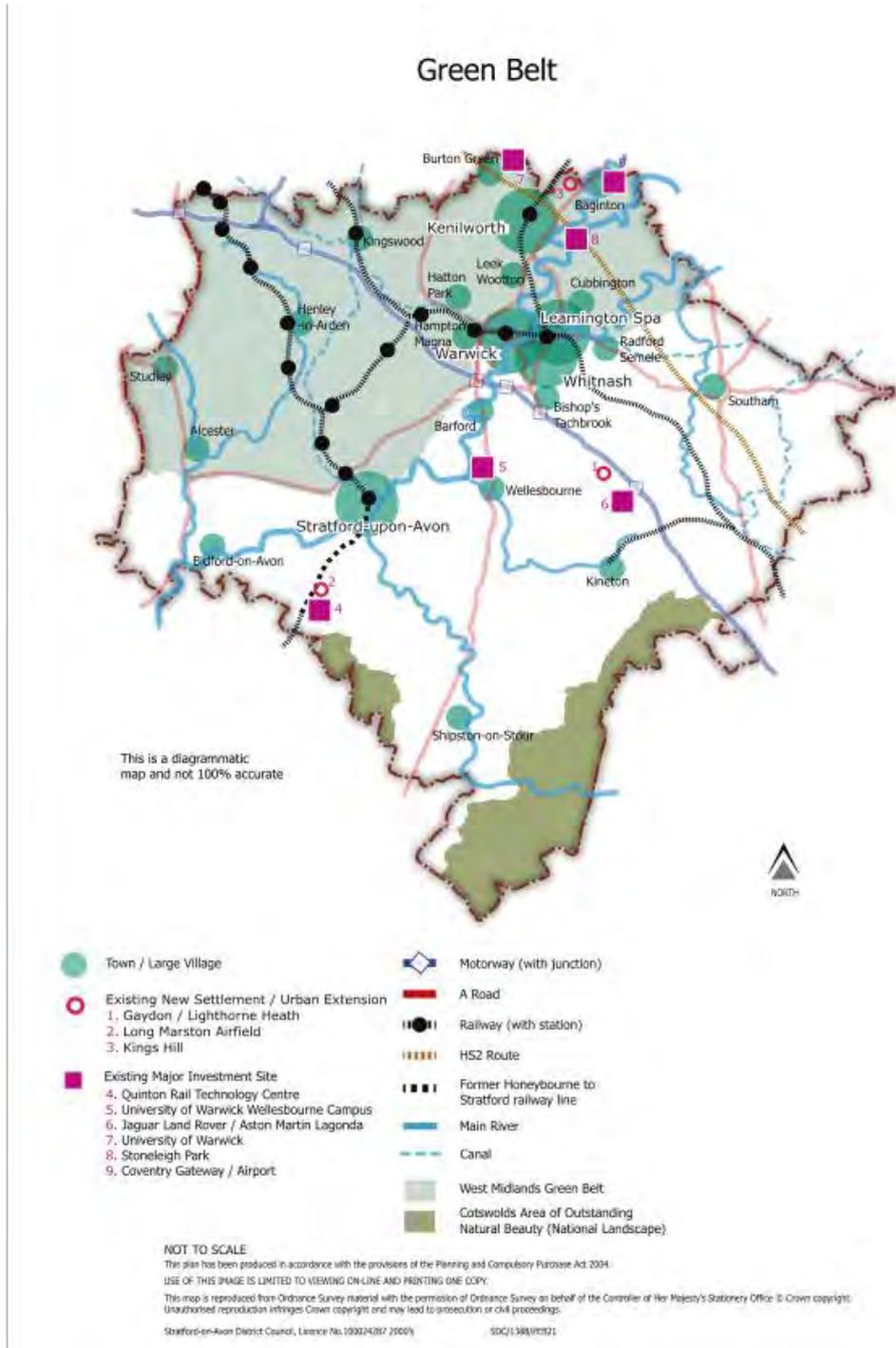
Main reasons/opinions given against:

- Setting a precedent
- Need to protect it for future generations
- Some views that this would not constitute sustainable development
- Some views that the green belt contributes to biodiversity and climate change aims
- The role of the green belt has not changed since it was designated
- Focus should be on brownfield and urban development first
- Contradicts the overarching principle of the Local Plan
- Should be increasing green belt instead
- Would damage the character of the area
- Impact of HS2 already on the green belt so should not exacerbate the impact
- Future potential for National Park designation
- It has a role in people’s health and wellbeing
- Already been loss of green belt in neighbouring areas
- Available land outside the green belt
- Plan should not be developer led
- Should not be the easy option to addressing development needs
- Non-green belt sites in sustainable locations should be prioritised

Figure 13 shows the extent of the existing Green Belt in South Warwickshire, covering the land to the north of Alcester, Stratford-upon-Avon and Royal Leamington Spa.

It includes some of the larger settlements such as Alcester, Henley-in-Arden, Cubbington and Kenilworth, and the majority of the area’s railway stations with several lines running through the area covered by Green Belt. Additionally, part of the area’s Canal and River network run through this area. Settlements within the existing Green Belt are some of the most closely located and connected of all the settlements within South Warwickshire to the West Midlands conurbation and the services and facilities that are available.

Figure 13 - Green Belt across South Warwickshire



The area of Green Belt within South Warwickshire is part of the wider West Midlands Green Belt, and there are five purposes of Green Belt designation which are set out in national policy:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other land

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on Avon District Core Strategy	CS.10	69	The purposes of the Green Belt will be upheld by resisting inappropriate development within it, except in cases where very special circumstances are justified in accordance with the provisions of national policy.
Warwick District Local Plan	DS.18	31	The Council will apply national planning policy to proposals within the green belt.

This Local Plan provides an opportunity to consider whether the existing Green Belt boundaries should be altered to allow for development in certain areas currently within it. National policy states that this can only be done where exceptional circumstances are fully evidence and justified. This would include demonstrating that all other reasonable options for meeting the development needs have been explored, including the use of brownfield land, optimising density and engaging with neighbouring authorities about accommodating any development needs. The need to promote sustainable patterns of development can contribute towards establishing a case for exceptional circumstances.

Optimising the use of brownfield land and densities are policy areas discussed elsewhere within this consultation document, and dialogue is ongoing with neighbouring authorities about meeting the sub-region’s development needs.

In identifying locations for development across South Warwickshire including those currently within the Green Belt, the need to address climate change and deliver a sustainable pattern of development is a critical factor. The location and spread of the Green Belt in South Warwickshire may mean that limiting growth to locations outside of the existing Green Belt designation may not be the most sustainable or climate friendly option as it pushes development away from areas that are well connected with good infrastructure and better access to facilities and services towards areas with more limited infrastructure and where further travel would be necessitated.

In the Scoping and Call for Sites consultation in 2021 there was a majority support for undertaking a review of Green Belt boundaries:

Additionally, stakeholder engagement undertaken in summer 2022 on strategizing potential growth options for South Warwickshire overwhelmingly supported exploring the potential for reviewing Green Belt boundaries to consider options for growth on the basis that it might deliver the most sustainable development strategy for South Warwickshire.

A review of the Green Belt across South Warwickshire is an important piece of evidence to underpin the approach taken in the Local Plan. It would consider whether there are any areas which no longer meet all five of the Green Belt purposes and could be removed to allow for the most sustainable development to come forward, including the provision of affordable housing and employment opportunities. Such a review could also look at the potential to add new areas of Green Belt where the five purposes are met. It would provide a transparent approach to enable all options for future development to be fully considered and scrutinised before a preferred strategy is taken forward.

For this reason, and at this early stage in refining the range of growth options that could deliver the most sustainable form of development in South Warwickshire, the approach taken has been ‘blind’ to whether a particular location or corridor is in the Green Belt.

This has resulted in all/some of the spatial growth options including an element of growth located within the Green Belt in order to achieve the required outcome. Information on how the growth options have evolved from the 2021 Scoping Consultation is available in the Spatial Growth Options Topic Paper “[Evolving the Spatial Growth Options – the story so far](#)”.

To achieve a growth strategy that addresses the vision and strategic objectives for the Plan, a Green Belt study to review the existing Green Belt boundaries would inform and help to refine the growth options that are set out within this Issues and Options consultation to enable a preferred approach for South Warwickshire to be established. This would complement other studies that are being prepared to inform the Local Plan, such as housing capacity, green infrastructure and landscape, heritage and economic and infrastructure needs. Together, these studies will provide a comprehensive evidence base to appraise and arrive at a sustainable pattern of development that meets the Plan’s objectives.

Issue S7: Refined Spatial Growth Options

What you said:

Of the 7 high-level growth options set out in the Scoping Consultation, the ‘most preferred’ was based around rail (21%)
Of the 7 high-level growth options set out in the Scoping Consultation, the least preferred was based around the road network (9%)
Circa 38% of respondents advocated for a hybrid approach to options. Rail, bus and enterprise options were most commonly identified to form part of a hybrid

One of the key things the South Warwickshire Local Plan will provide is a “spatial development strategy”. This is a strategy which determines how much growth will be directed to different locations in South Warwickshire, to provide for our needs to 2050. The aim is to provide homes, jobs, green spaces and other infrastructure in the most suitable and sustainable places. For example, finding the locations where people can most effectively integrate into existing communities or create self-sufficient new communities; access employment, education and the services they need; live healthy lives; and minimise dependence on the private car. The strategy needs to be robust and flexible, in order to be of value for the whole plan period.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS15	83	The spatial growth strategy as set out in this policy is based on a pattern of balanced dispersal primarily focussing on the main town of Stratford-upon-Avon, a number of Main Rural Centres and small Local Service Villages, two new settlements and a range of large rural brownfield sites.
Warwick District Local Plan	DS4 and H1	17 and 64	Focuses development within and adjacent the built up areas with the majority at Warwick, Leamington, Whitnash and Kenilworth and the southern edge of Coventry, with some development in identified Growth Villages and Limited Infill Villages.

The previous round of consultation (the Scoping Consultation) presented seven potential spatial growth options. These options were focussed on: Rail Corridors; Main Bus Corridors; Main Road Corridors; Enterprise Hubs; Socio Economic; Main Urban Areas; Dispersed.

Officers have considered the responses to the Scoping Consultation, and other emerging evidence. This includes undertaking Settlement Analysis work, and conducting a range of stakeholder workshops during the summer of 2022. This has led to an evolution of the potential spatial growth strategies. Further details of this evolution process can be seen in the topic paper “[Evolving the Spatial Growth Options – the story so far](#)”. The outcomes of the stakeholder workshops can be seen in the report “[Spatial Growth Strategy Workshop Outcomes](#)”.

Five growth options are presented in this Issues and Options Consultation. Some of the spatial growth options presented here are brought forward directly from the Scoping Consultation, while others are hybrids of one or more options.

- Option 1: Rail Corridors
- Option 2: Sustainable Travel
- Option 3: Economy
- Option 4: Sustainable Travel and Economy
- Option 5: Dispersed

Further details of each option can be seen below.

At this stage, to fully consider all options, the spatial growth options are presented with Green Belt policy “off” - i.e. all five options include some Green Belt locations. Decisions on whether to take land out of the Green Belt are interlinked with the selection of a growth option, and the balance of Green Belt and non-Green Belt locations varies between growth options. The issue of Green Belt boundaries is discussed in the section “[A Review of Green Belt Boundaries](#)”.

An initial analysis of each of the spatial growth options has been conducted through both the [Sustainability Appraisal](#) and the [Climate Change emissions testing assessments](#). Both of these evidence sources are available to view on our [technical evidence webpage](#). We will be using the outputs of these assessments, along with other evidence, to inform our Preferred Spatial Growth Option as the Local Plan progresses.

Sustainability Appraisal (SA)

To help ensure that the Local Plan includes the most suitable planning policies and development allocations, the SA identifies, describes and evaluates a number of different reasonable alternative policies and development locations. Further information on the SA, the key used for the assessment table and a question to provide any comments can be found in [Section 4.1](#).

Included within the SA is an exploration of a number of alternative options, including each of the 5 spatial growth options. Table 7 below sets out a summary of the analysis, further detail of the SA assessments of these locations can be found in section 6 and appendix D of the SA [here](#).

Conclusions of the high level assessment of the Spatial Growth Options that are not all distinct from each other, with the exception of Option 5, means that sustainability performance can only be evaluated with several caveats. These include the fact that detailed locational information is not available and the ability to identify effects with precision is challenging. The scores in Table 7 are strictly a guide and do not represent a diagnostic analysis. Mitigation has not been factored into the performance of the Growth Options since it is best worked up once more detailed locational information is available.

Different options are likely to perform better for certain SA Objectives than others. With this in mind an overall best performing option is hard to identify. Option 5 is the worst performing Option whilst Option B is likely to align most closely with development that will ultimately seek the most effective mitigation against climate change. These options will also deliver better performance in respect of pollution and natural resource impacts since they are both slightly more concentrated than Options 3 and 4. However, whilst they perform positively for employment and economy, Options 3 and 4 are best in this respect. Without further detail, all options perform the same for waste and housing.

Table 7 – High level sustainability appraisal of Spatial Growth Options

Spatial Option	1	2	3	4	5
Description	Rail Corridors	Sustainable Travel	Economy	Sustainable Travel and Economy	Dispersed
SA Objective 1: Climate change	-	-	-	-	--
Objective 2: Flood risk	0	0	0	0	0
Objective 3: Biodiversity	+/-	-	-	-	--
Objective 4: Landscape	-	+	-	-	+
Objective 5: Cultural Heritage	+/-	+/-	+/-	+/-	+
Objective 6: Pollution	+	+	+/-	+/-	+/-
Objective 7: Natural Resources	+	+	-	-	0
Objective 8: Waste	-	-	-	-	-
Objective 9: Housing	++	++	++	++	++
Objective 10: Health	+/-	+/-	+/-	+/-	--
Objective 11: Accessibility	++	+	-	+	--
Objective 12: Education	+/-	+/-	+/-	+/-	-
Objective 13: Economy	+	+	++	++	-

Climate Change Emissions Estimation

As part of the evidence to inform the Local Plan an operational carbon model has been developed to assess carbon emissions at a strategic level and test how the development of the five growth options performs against each other. Each growth option is modelled as a scenario where various levers and inputs reflect different policy and design decisions and changes in the market. The model is based on current Government and existing Local Plan policies and the results of the scenario modelling give a better understanding of which levers will have the greatest impact on future carbon emissions of each growth option.

The model has been built in a flexible madder to allow more detailed data to be easily added at future stages of the preparation of the Local Plan. This could include additional site specific information, emerging policy direction at each stage of the Plan and other or updated sources of information such as further data released from Census 2021 – like travel mode split.

Figures 14 and 15 show the cumulative and year on year annual emissions for the five potential growth options. From this we can determine that the Sustainable Travel & Economy growth option resulted in the lowest final annual emissions in 2050 compared with the alternative options, whilst the Dispersed option has the highest emissions compared with the alternatives. Despite having the lowest annual emissions in 2050, cumulative emissions for the Sustainable Travel & Economy growth are higher in 2050 than many other growth options. This is due to the Sustainable Travel & Economy growth option’s emissions peaking higher than all other options in 2030. The total area under this emissions pathway curve is therefore greater than many of the other growth options resulting in higher cumulative emissions by 2050.

Further information on the Estimation of Emissions study is available to view [here](#).

Figure 14 – Cumulative emissions comparison (tCO₂e)

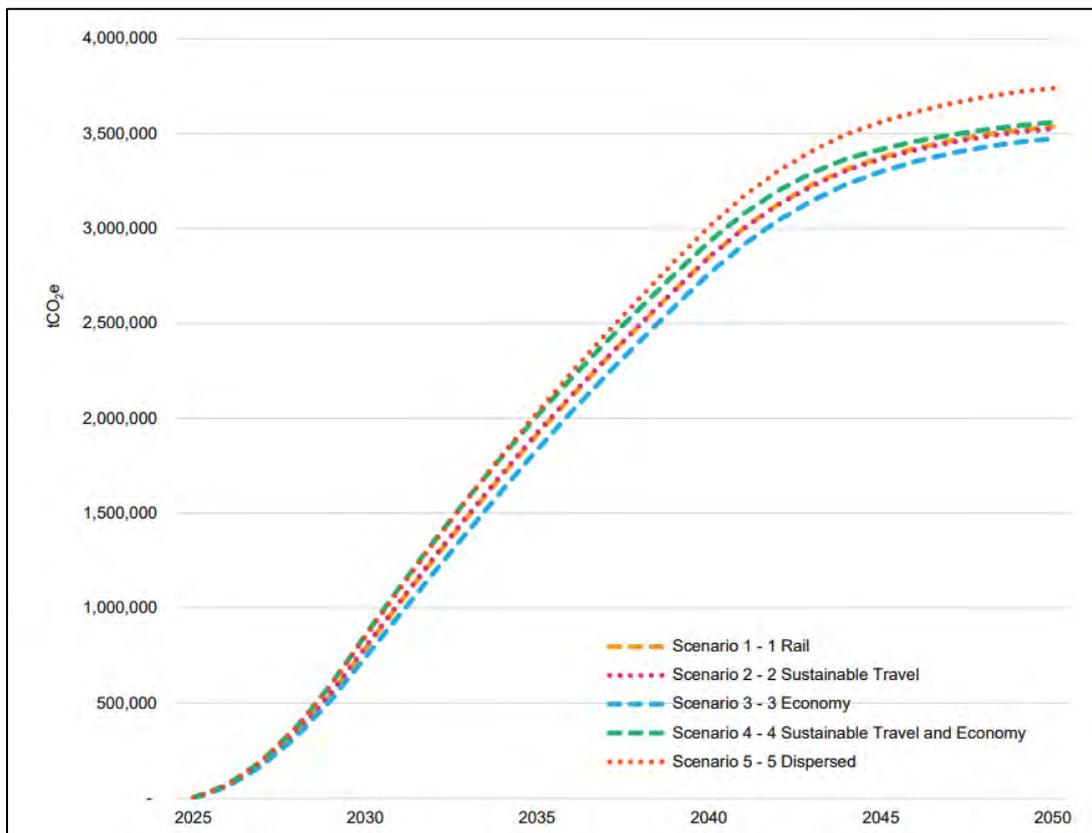
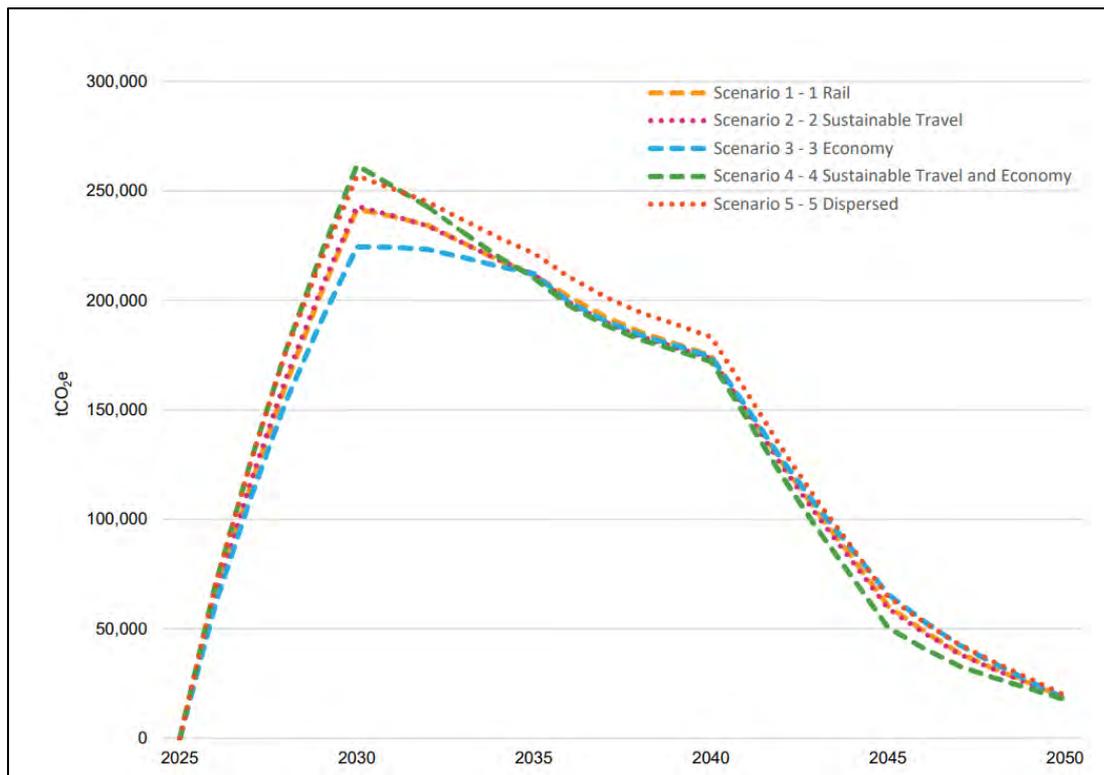


Figure 15 – Annual emissions comparison (tCO₂e)



Q-S7.1: Please provide any comments you have on the emissions estimation modelling for the five growth options?

The spatial growth options will further evolve through the plan process, narrowing down to a single option which will be presented in the “Preferred Options” consultation. This further evolution will be influenced by a range of evidence, including: responses to this consultation; Carbon Emissions assessments, Sustainability Assessments, Urban Capacity Study, Green Infrastructure Strategy, Heritage Assessments, Green Belt Study, Strategic Flood Risk Assessment, Water Cycle Strategy, Strategic Transport Assessment for all modes (includes traffic modelling), Landscape Character Assessments, and land availability.

The maps and named locations shown here indicate approximate locations within each option where growth might feasibly happen. This includes settlements or locations considered to be within active-travel distance of key features such as a rail station or major employment site. The inclusion or exclusion of a particular location is not intended as a firm commitment, and other locations not indicated might fit within a particular growth strategy.

In particular, some of the strategies include growth at the scale of a new settlement. This is not intended to pre-judge the outcomes of new settlement work – see section “[The Potential for New Settlement\(s\)](#)”. No detailed analysis of individual sites or land availability has yet happened, so all potential growth locations should be taken as broad indications rather than firm proposals.

Option 1 – Rail corridors

Option 1 is brought forward from the Scoping Consultation. This focusses growth in rail corridors, particularly around existing railway stations, but also anticipating the possibility of new or re-opened stations on existing lines, or re-opening closed lines. Focussing housing and employment growth around railway stations can contribute to sustainable development, by giving residents and employees sustainable travel options, reducing dependence on road transport.

However, most of the existing railway stations in South Warwickshire lie within or close to the West Midlands Green Belt, and consequently this growth option would require the release of a significant amount of Green Belt land.

South Warwickshire’s railway stations are not evenly spread over the area, and many are in very small settlements. As well as growth directed to larger settlements, this growth option sees many of these small settlements taking moderate growth (say a few hundred dwellings each) which would noticeably impact on their current rural character. The cumulative effect over a wider area could also be significant. In addition, perhaps four locations would need to take growth at the scale of a new settlement (say 6,000 dwellings or more) – and the viability of each individual new settlement could be compromised if they are clustered too closely together. To some extent this issue could be tackled by reducing the number of new settlements and increasing their size.

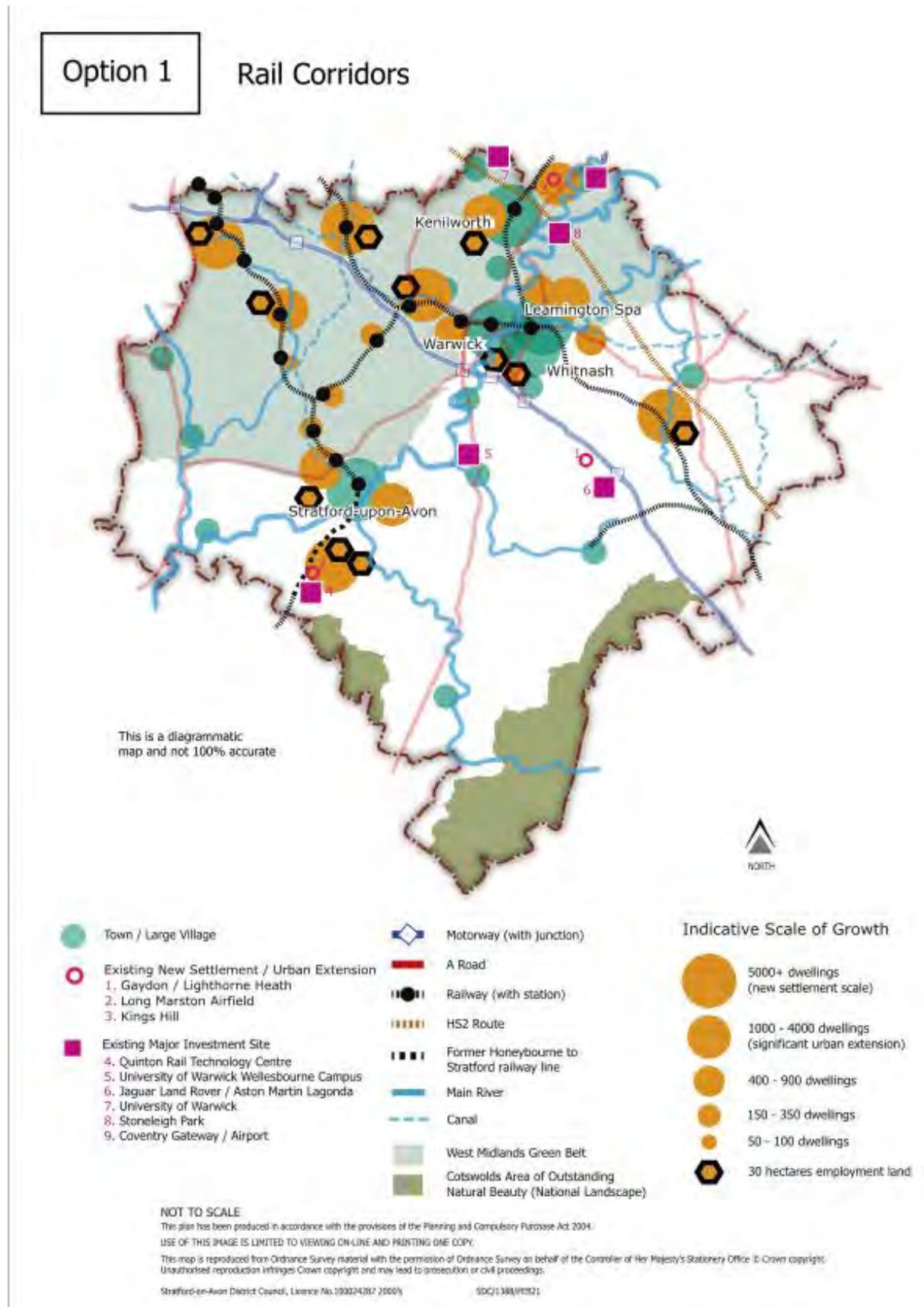
It should be noted that at this stage in the plan-making process, no detailed feasibility work has been undertaken around the capacity of existing rail infrastructure or the potential for enhanced or new services. There may be locations identified in these growth options where rail improvements are found not to be feasible, or where the existing capacity could support only limited growth. Further work will be undertaken as the growth options are further refined.

The new settlement locations shown in this option are indicative and should not be taken as firm proposals.

Indicative list of settlements and locations that may feature in Option 1:

Bearley, Claverdon, Cubbington, Depper’s Bridge, Grey’s Mallory, Hampton Magna / Warwick Parkway, Hatton Station, Henley-in-Arden, Kenilworth, Kingswood (Lapworth), Leamington Spa, Long Marston Airfield, Radford Semele, South of Coventry – Kings Hill, Stratford-on-Avon, Wilmcote, Wood End, Wootton Wawen.

Figure 16 – Option 1 - Rail Corridors



Option 2 – Sustainable Travel

Option 2 is a hybrid of the rail corridor and main bus corridor options presented in the Scoping Consultation. It aims to build on the strengths of Option 1, while recognising that in many parts of South Warwickshire, bus travel is the only viable public transport option. Utilising the main bus corridors relieves some of the pressure on Green Belt land, shifting the balance of growth away from the North and West of the South Warwickshire area.

When compared to Option 1, this option results in development at fewer of the smaller settlements that have railway stations, and there are fewer developments at the scale of a new settlement. As a broad indication, the map suggests two new settlements on railway lines, but as with Option 1, *the new settlement locations are indicative and should not be taken as firm proposals.*

Building on main bus corridors is, of course, based on the road network. This could be seen as a less sustainable option if new residents and employees do not choose to use the bus service. However, by positioning new development on main bus corridors, people are provided with the choice.

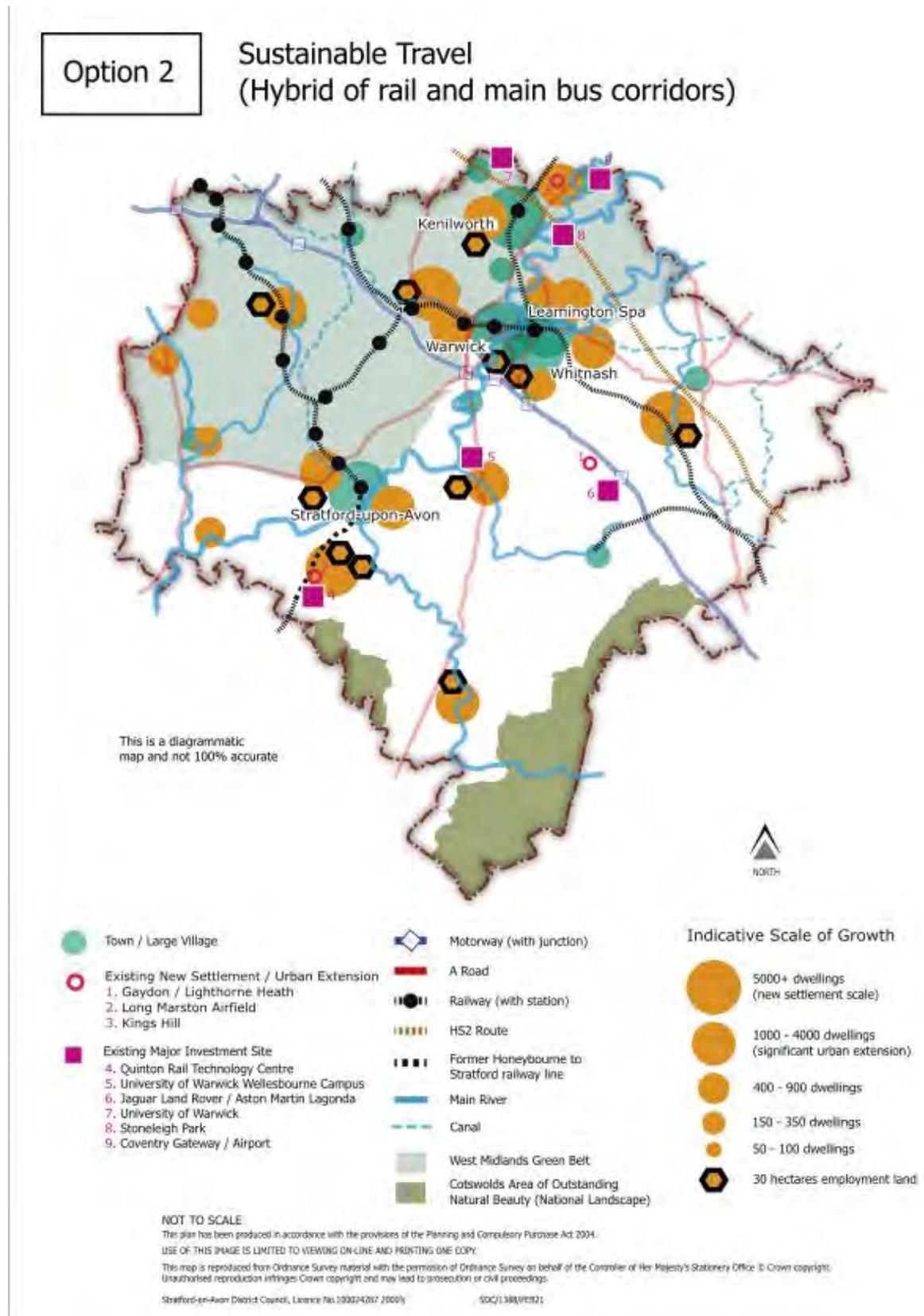
Within this option, there are also question marks around the best way to support bus travel in South Warwickshire. The approach taken here aims to strengthen existing bus routes by placing potential new users on well-served corridors. An alternative approach would be to use development to ‘plug the gaps’, where significant numbers of new residents and employees could encourage new or improved bus services to areas that are currently poorly served.

At this stage in the plan-making process, no detailed feasibility work has been undertaken around the capacity of existing bus and rail infrastructure or the potential for enhanced or new services. There may be locations identified in these growth options where bus or rail improvements are found not to be feasible, or where the existing capacity could support only limited growth. Further work will be undertaken as the growth options are further refined.

Indicative list of settlements and locations that may feature in Option 2:

Alcester, Bidford-on-Avon, Bishop’s Tachbrook, Cubbington, Depper’s Bridge, Grey’s Mallory, Hampton Magna / Warwick Parkway, Hatton Station, Henley-in-Arden, Kenilworth, Leamington Spa, Long Marston Airfield, Mappleborough Green / East of Redditch, Radford Semele, Shipston-on-Stour, South of Coventry – Kings Hill, Stratford-on-Avon, Studley, Wellesbourne.

Figure 17 – Option 2 – Sustainable Travel



Option 3 – Economy

Option 3 is a hybrid of the socio-economic and enterprise hubs growth options presented in the Scoping Consultation. This option aims to locate homes close to existing jobs and potential new job locations; and to tackle socio-economic disadvantage through the benefits development can bring. These benefits could be in the form of Developer Contributions towards infrastructure, and providing affordable housing.

A growth option where jobs and homes are co-located means that more people are given the option of living close to their place of work. Shorter journeys mean that active travel options are more appealing and are more likely to be chosen as a feasible way of getting to work.

Many businesses are reliant on the strategic road network for transporting products, and realistically this is unlikely to change significantly in the near future. Putting housing development close to enterprise hubs does therefore mean that people may still choose to use private cars as the main way they get around. An employment location well connected on the strategic highway network might mean people simply choose to commute by car rather than living close to their place of work.

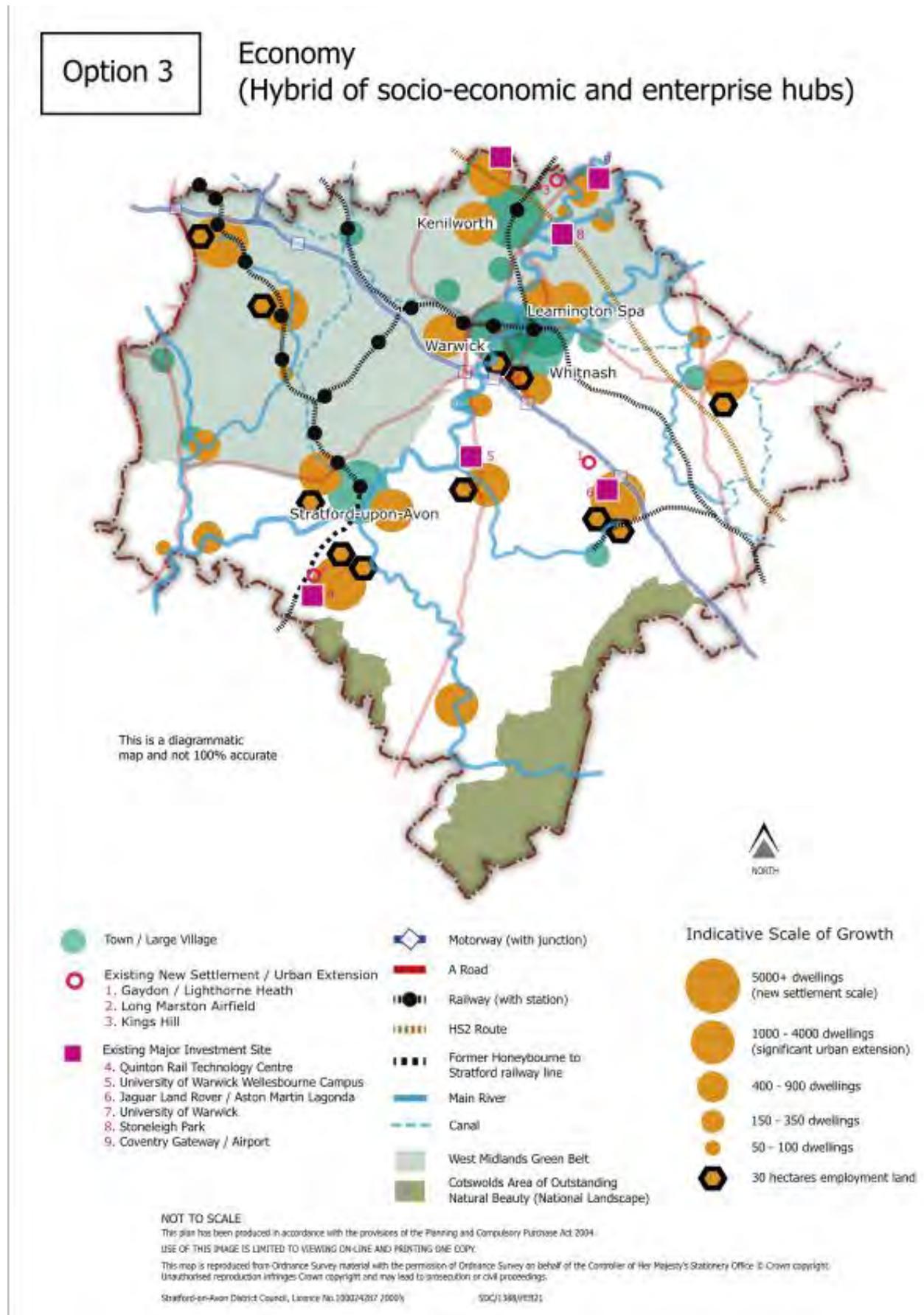
In this option, growth at new settlement scale is focussed close to existing motorway junctions. *The locations of these new settlements are indicative and should not be taken as firm proposals.*

Proximity to employment locations is only one aspect of sustainability, and this option does suggest growth in some smaller settlements that would otherwise not be considered sustainable locations, when taking into account the range of facilities and services available in each settlement.

Indicative list of settlements and locations that may feature in Option 3:

Alcester, Baginton, Barford, Bidford-on-Avon, Bishop’s Tachbrook, Bubbenhall, Cubbington, Gaydon / Lighthorne Heath, Grey’s Mallory, Hampton Magna / Warwick Parkway, Henley-in-Arden, Kenilworth, Leamington Spa, Long Marston Airfield, Long Itchington, Salford Priors, Shipston-on-Stour, South of Coventry – Westwood Heath, Southam, Stoneleigh, Stratford-on-Avon, Wellesbourne, Wood End, Wootton Wawen.

Figure 18 – Option 3 – Economy (Hybrid of socio-economic and enterprise hubs)



Option 4 – Sustainable Travel and Economy

Option 4 is a hybrid of options 2 and 3. It aims to take the best aspects of each, to address the main aims of each individual option. The broader focus of this option allows the selection of the most suitable locations that fall within each individual option, while avoiding many of the ‘second choice’ locations that inevitably arise when working within a highly constrained growth option.

This option provides a balance of growth at existing main settlements, some growth at new settlement scale on the rail lines, and more modest growth in smaller settlements, which can contribute to enhancing the viability of village centres and provide affordable housing.

The growth in this option is balanced between Green Belt and non-Green Belt locations, but even so it should be recognised that it relies on the release of significant amounts of Green Belt land.

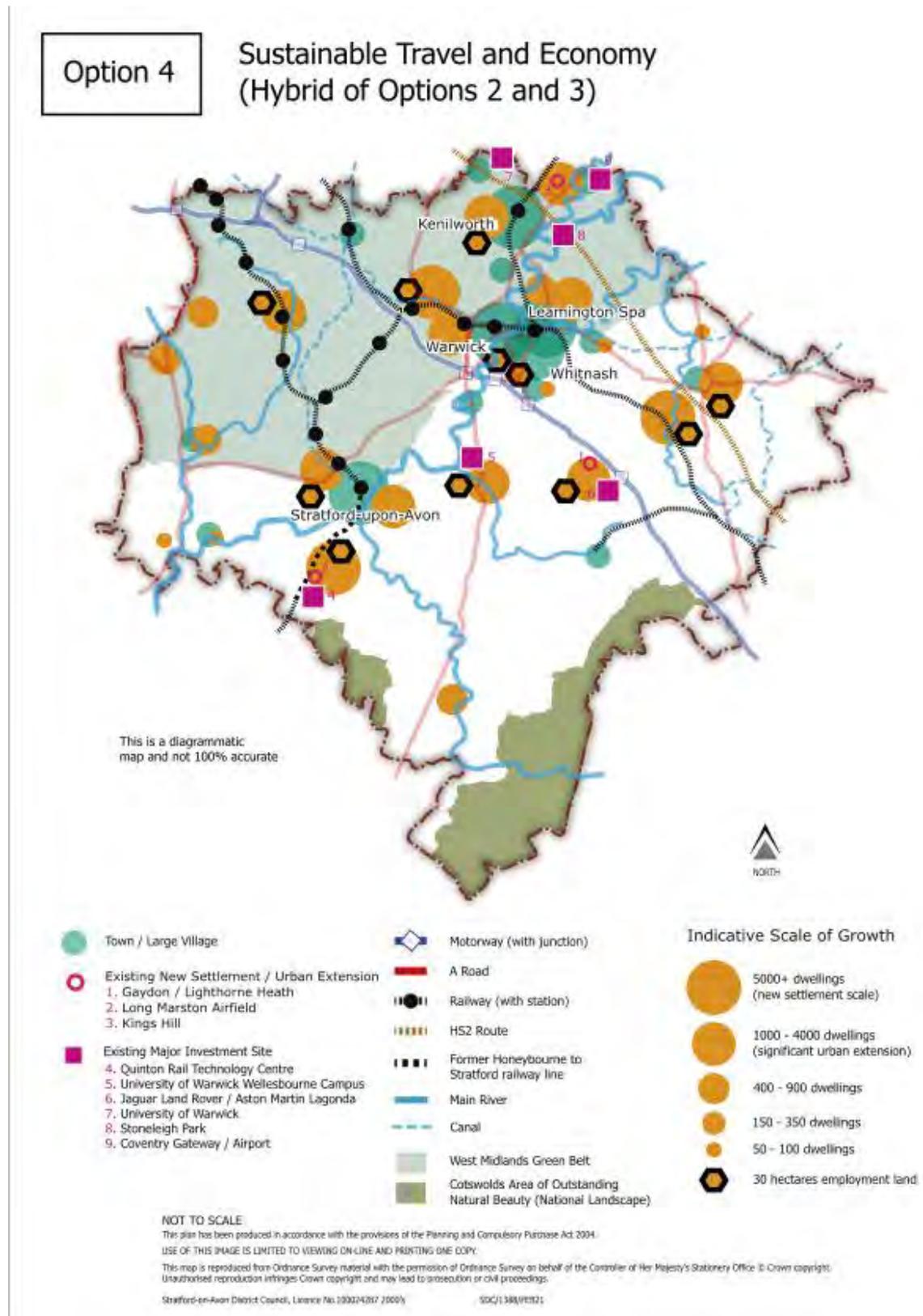
At this stage in the plan-making process, no detailed feasibility work has been undertaken around the capacity of existing bus and rail infrastructure or the potential for enhanced or new services. There may be locations identified in these growth options where bus or rail improvements are found not to be feasible, or where the existing capacity could support only limited growth. Further work will be undertaken as the growth options are further refined.

As with other options, new settlement locations are indicative and should not be taken as firm proposals.

Indicative list of settlements and locations that may feature in Option 4:

Alcester, Bidford-on-Avon, Bishop’s Tachbrook, Cubbington, Depper’s Bridge, Gaydon / Lighthorne Heath, Grey’s Mallory, Hampton Magna / Warwick Parkway, Hatton Station, Henley-in-Arden, Kenilworth, Leamington Spa, Long Marston Airfield, Long Itchington, Mappleborough Green / East of Redditch, Radford Semele, Salford Priors, Shipston-on-Stour, South of Coventry – Kings Hill, Southam, Stratford-on-Avon, Studley, Wellesbourne.

Figure 19 – Option 4 – Sustainable Travel and Economy



Option 5 – Dispersed

Option 5 is brought forward from the Scoping Consultation. Dispersal of growth to a wider range of locations can mean that the amount of growth in individual settlements is reduced, but with a higher number of settlements taking some growth.

Dispersing growth can enhance the vitality of individual settlements, bringing in new customers to rural facilities, and providing affordable housing. However, it is harder to provide new or upgraded infrastructure to a dispersed population.

Dispersing growth would not help encourage sustainable travel, as many of the new homes would inevitably be poorly connected by public transport, and long distances from the facilities needed for day-to-day life.

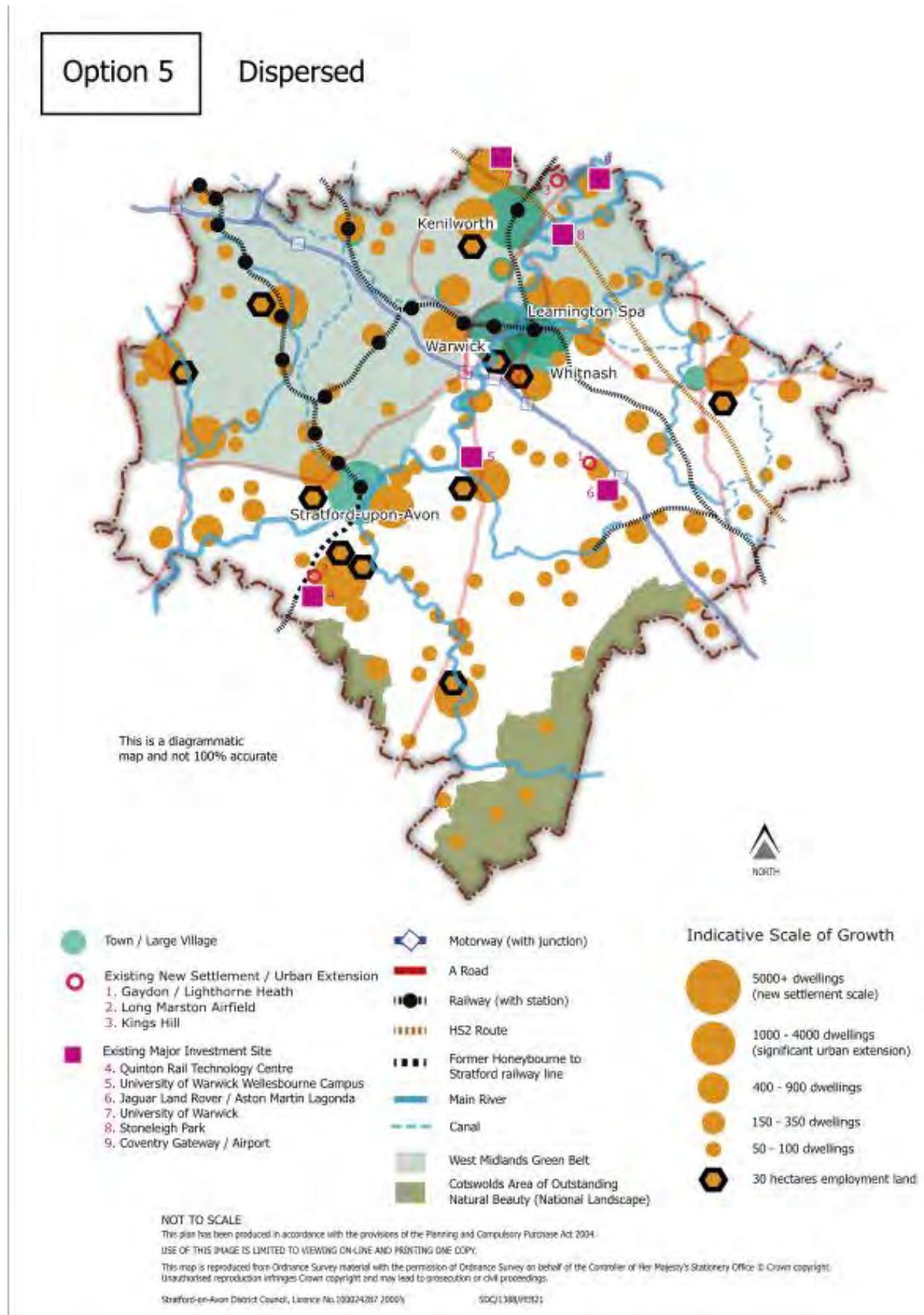
Within this option there are many ways that growth could be dispersed. Settlements would be categorised to reflect the range of facilities currently present and their current population size. This would then determine how much growth is considered appropriate in each location. The distribution shown on the map shows one way this might be achieved.

The pattern of dispersal follows existing settlements, and consequently there is a balance of Greenbelt and non-Greenbelt land required. This option also includes modest growth in a number of settlements within the Cotswolds National Landscape AONB.

Indicative list of settlements and locations that may feature in Option 5:

Alderminster, Alcester, Alveston, Ardens Grafton, Aston Cantlow, Avon Dassett, Baddesley Clinton, Baginton, Barford, Bearley, Beausale, Bidford-on-Avon, Binton, Bishop’s Tachbrook, Bishop’s Itchington, Blackwell, Brailes, Bubbenhall, Butlers Marston, Claverdon, Clifford Chambers, Cubbington, Darlingscott, Eathorpe, Earlswood, Ettington, Farnborough, Fenny Compton, Gaydon, Great Alne, Great Wolford, Grey’s Mallory, Halford, Hampton Lucy, Hampton Magna / Warwick Parkway, Harbury, Haselor, Hatton Park, Henley-in-Arden, Honington, Ilmington, Kenilworth, Kineton, Kingswood (Lapworth), Ladbroke, Leamington Spa, Leek Wootton, Lighthorne, Lighthorne Heath, Little Compton, Long Compton, Long Marston, Long Marston Airfield, Long Itchington, Lower Shuckburgh, Loxley, Mappleborough Green / East of Redditch, Moreton Morrell, Napton on the Hill, Newbold on Stour, Newbold Pacey, Northend, Norton Lindsey, Offchurch, Oxhill, Pillerton Hersey, Pillerton Priors, Preston on Stour, Priors Hardwick, Priors Marston, Quinton, Radford Semele, Rowington, Salford Priors, Sambourne, Sherbourne, Shipston-on-Stour, Shotteswell, Snitterfield, South of Coventry – Westwood Heath, Southam, Stockton, Stoneleigh, Stratford-on-Avon, Stretton on Fosse, Studley, Tanworth in Arden, Temple Herdewkye, Tiddington, Tredington, Tysoe, Ufton, Ullenhall, Wappenbury, Warmington, Wasperton, Welford-on-Avon, Wellesbourne, Weston under Wetherley, Whichford, Whitnash, Wilmcote, Wood End, Wootton Wawen, Wormleighton.

Figure 20 – Option 5 - Dispersed



Q-S7.2: For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire:

Option 1: Rail Corridors

Appropriate strategy / Neutral / Inappropriate strategy
Further comments

Option 2: Sustainable Travel

Appropriate strategy / Neutral / Inappropriate strategy
Further comments

Option 3: Economy

Appropriate strategy / Neutral / Inappropriate strategy
Further comments

Option 4: Sustainable Travel and Economy

Appropriate strategy / Neutral / Inappropriate strategy
Further comments

Option 5: Dispersed

Appropriate strategy / Neutral / Inappropriate strategy
Further comments

Issue S8: Small scale development outside of the chosen spatial growth option

Whichever growth option is selected, with a relatively long plan period it is likely that some growth may be appropriate in settlements that fall outside of the chosen growth strategy. Small scale development can play a role in preserving the vitality of smaller settlements, for example by providing additional pupils for the local school, new customers for local facilities, and by helping ensure people can stay living locally when their accommodation needs change.

It is difficult to predict where and when these needs will arise, with a plan period running to 2050. This means that allocating very small sites in a large number of small settlements may not be appropriate.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.10	69	Limited infilling permitted in Green Belt, where the site is brownfield or within a Local Service Village.
Stratford-on-Avon District Core Strategy	CS.15	83	Small-scale community-led schemes permitted within or adjacent to settlements.
Stratford-on-Avon District Core Strategy	CS.16	90	The 4 categories of Local Service Villages each have an overall approximate allocation of dwellings in the plan period, with an approximate limit for any individual settlement. Individual sites are not identified.
Stratford-on-Avon District Core Strategy	AS.10	192	Small scale housing development permitted within the built up area boundaries of Local Service Villages, or otherwise within the physical confines. Small-scale community-led schemes permitted within or adjacent to settlements.
Warwick District Local Plan	H1	64	Housing development permitted within the boundaries of Growth Villages and Limited Infill Villages, or adjacent to urban areas or Growth Villages
Warwick District Local Plan	H11	78	Limited infilling permitted in Green Belt Limited Infill Villages, for sites of up to two dwellings, filling a gap in otherwise uninterrupted frontage, and preserving the integrity of the village

It is expected that limited infill within settlement boundaries will be permitted in the SWLP. This is in line with the approach to infill currently seen in Stratford’s policy AS.10 and Warwick’s policy H1. This can be seen as the baseline position.

An alternative approach, to allow for slightly more development, would be to specify thresholds under which developments are likely to be acceptable, where they are within or adjacent to existing settlements. This is similar to the approach currently seen in Stratford’s policy CS.16 as regards Local Service Villages. CS.16 allocates a figure for a whole category of Local Service Village; alternatively, this could be applied to individual settlements. In either approach, a size limit would be applied to restrict the amount of development on each individual site. A limit of 10 dwellings or fewer is suggested.

Q-S8.1: For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward? Y/N/DK

Q-S8.2: For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?

Limit of 10 dwellings per site

A higher limit is appropriate

A lower limit is appropriate

Issue S9: Settlement Boundaries and infill development

Settlement boundaries are important, especially in a predominantly rural area such as South Warwickshire. Boundaries help to establish, amongst other aspects of development, where new non-strategic small-scale housing may be appropriate with the confines of existing settlements.

A small but important supply of housing can come from this type of development– often referred to as ‘infill’ development – and the more that can suitably be achieved in this way can reduce the amount of new growth required outside of existing settlements.

The Plan needs to consider whether any existing settlement boundaries should be altered to take account of a new growth strategy up to 2050. A key aspect of sustainable development in rural areas is locating housing where it will enhance or maintain the vitality of rural communities, and national policy requires plans to identify opportunities for villages to grow and thrive, especially where this will support local services.

In Stratford-on-Avon District, settlement boundaries are not defined for the smallest settlements, except where this has happened individually through Neighbourhood Development Plans. In contrast, the Warwick District Local Plan does define boundaries for smaller settlements.

Current adopted and emerging policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS15	83	This policy sets out settlement boundaries on the Policies Map for the main town of Stratford-upon-Avon, the eight Main Rural Centres and two new settlements Gaydon Lighthorne Heath and Long Marston Airfield. Smaller settlements do not have boundaries defined within the Core Strategy. The settlements of Alcester, Bidford-on-Avon, Kineton, Shipston-on-Stour and Wellesbourne have settlement boundaries defined in ‘made’ Neighbourhood Development Plans which supersede the Core Strategy Policies Map.
Warwick District Local Plan	H1	64	This policy sets settlement boundaries for a number of settlements within the District comprising the defined

			Urban Areas, Growth Villages and Limited Infill Villages. The latter category includes smaller settlements.
Neighbourhood Development Plans (NDPs)	N/A	N/A	A number of made Neighbourhood Development Plans (NDPs) in Stratford-on-Avon District have established Built Up Area Boundaries (BUABs) for their respective areas.
Stratford-on-Avon District emerging Site Allocations Plan (SAP)	SAP.8	64	Built Up Area Boundaries (BUABs) are defined for Local Service Villages where these do not already have a BUAB in a made or well-advanced NDP. The BUAB for Southam is also revised. Boundaries are not defined for the smallest settlements.

Q-S9: Please select the option which is most appropriate for South Warwickshire

Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.

Any revisions to existing boundaries, and consideration of which settlements have boundaries, would be saved for Part 2 plans and NDPs. The advantage of this approach is that waiting until Part 2 is likely to mean more detailed information is available – for example non-strategic allocations will likely not be made until Part 2, so waiting for these to come forward means any boundary revisions can accurately reflect new allocations. The disadvantages are that inconsistencies of approach between Stratford-on-Avon and Warwick Districts would not be addressed in the short term; and it results in a longer time period to address any out-of-date boundaries.

Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.

The aim would be to achieve a consistent approach across Stratford-on-Avon and Warwick Districts regarding the type or size of settlement that has a defined boundary. The main impact is on where limited infill development is permitted, and where ‘open countryside’ policies apply. The disadvantage is that some non-strategic land allocations will likely not be made until Part 2 plans come forward. In such cases, it becomes difficult to make appropriate revisions to boundaries in advance of these non-strategic allocations.

The SWLP team consider that it would not be appropriate to revise the extent of existing boundaries, without also addressing which settlements have boundaries. Such an approach would have the same disadvantage as option S9b, above, but without addressing the underlying inconsistency between the two Councils. For this reason, it has not been presented as an option within this consultation.

Issue S10: Any other development strategy issues

Q-S10: Please add any comments you wish to make about the development distribution strategy for South Warwickshire

5: Delivering South Warwickshire’s Economic Needs

Chapter 5 sets out various options as to how we might meet our economic challenges facing us to 2050 and seeks your views on the 10 key economic issues:

- Issue E1: Growing the South Warwickshire economy
- Issue E2: A low carbon economy
- Issue E3: Diversifying the economy
- Issue E4: Sustaining a rural economy
- Issue E5: lack of business accommodation
- Issue E6; Protecting South Warwickshire’s economic assets
- Issue E7: Core Opportunity Area and Major Investment Sites
- Issue E8: Existing employment sites
- Issue E9: Supporting our changing town centres
- Issue E10: Tourism
- Issue E11: Any other economic issues

South Warwickshire is the gateway to the West Midlands benefitting from direct access to London via the M40 and the Chiltern mainline. It is situated only 10 miles from Birmingham and HS2 will provide direct access to the North. Due to its location, businesses within South Warwickshire are well placed to capitalise on a wide range of economic opportunities, not only from the West Midlands but from the East Midlands, Southeast and Southwest of England. South Warwickshire is traversed by the A46 which is a key strategic route connecting the Humber Ports with the cities of the Severn Estuary.

Issue E1: Growing the South Warwickshire economy

What you said:

- There should be the attraction and support for businesses looking at new technologies.
- Creating new investment opportunities from within and outside of the South Warwickshire area to generate good quality sustainable jobs, with emphasis on localism.
- Encouraging the creation of small and micro-businesses through appropriate land use in our town centres.

The Government published a Levelling Up White Paper in February 2022 which included several commitments in relation to economic growth. There is a specific recognition of the role Jaguar Land Rover has taken in Coventry & Warwickshire in relation to its contribution it plays to the local economy and community. Both Districts will also benefit from the UK Shared Prosperity Fund, with an additional benefit of Rural Prosperity Funding for Stratford-on-Avon District.

In addition, to the South Warwickshire Local Plan, the two councils are also preparing an Economic Strategy for South Warwickshire that will set out the economic vision for Stratford and Warwick Districts, and how the economy of South Warwickshire can be given the opportunity to continue to

flourish and grow. The South Warwickshire Economic Strategy seeks to capitalise on the unique strengths that South Warwickshire benefits from and act as a catalyst for inward investment. This can be summarised as the creativity of its people, the innovation of its businesses and the opportunity of its places.

Coventry and Warwickshire is a £26 billion economy, accounting for 19% of West Midlands GVA and growth in GVA has slightly out-performed regional and national trends. The HEDNA has considered employment land requirements across Coventry and Warwickshire to 2050. These are shown in Table 8. A total of 345.3 hectares of office (Use Class B1) and general industrial (use Class B2) land is required across South Warwickshire to 2050. In addition, a proportion of the 709 hectares of strategic B8 employment land (i.e. warehousing and distribution) identified for the wider Coventry and Warwickshire sub-region will also be required.

South Warwickshire has been successful over many years at attracting major employers across a range of high value sectors, notably vehicle design and engineering, software and games development, and HQ and business professional financial services. South Warwickshire has also long been a strong area for tourism. Key to all of this has been the talent attracted and retained to the area, and the quality of a number of key cultural assets located within South Warwickshire (e.g. the Royal Shakespeare Company and Warwick Castle).

Whilst new employment land allocations along the strategic road network do lend themselves well to logistics - and no doubt there would be interest from occupiers – such activities would fail to maximise the economic potential of South Warwickshire and fail to capitalise on the strengths of the existing sectors and skills of the workforce.

The different types of employment land (e.g. B1, B2 and B8) generate different job ratios and growing the South Warwickshire economy is about maximising the number of additional jobs for the available employment land and not providing employment land per se.

Table 8: Employment Land Requirements to 2050 (hectares)

	<i>Office</i>	<i>General Industrial</i>	<i>Total</i>
<i>Stratford-on-Avon District</i>	<i>7.2</i>	<i>240.9</i>	<i>248.1</i>
<i>Warwick District</i>	<i>15.8</i>	<i>81.4</i>	<i>97.2</i>

(Source: Table 15.3, Coventry & Warwickshire HEDNA, Icen Consulting)

Q-E1.1: Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire? Y/N/DK

Q-E1.2: If your answer to E-1.1 is No, what would be a more appropriate approach to calculating future employment needs for this Local Plan?

Issue E2: A Low Carbon Economy

What you said:

- The “green economy” is an important factor in diversification.
- There were several suggestions as to how a carbon neutral economy can be encouraged such as giga factories, house retrofitting, building construction and renewable energy generation supported by new educational and training opportunities for upskilling.
- Need to financially support low carbon business in the area.
- Encourage all businesses and employment land freeholders to improve energy efficiency of buildings and renewable energy.
- Support for decentralised, low carbon and renewable energy generation and community initiatives.
- Need to adapt to living sustainably, reduce consumption and waste and develop a carbon neutral economy.
- Vision for South Warwickshire should be that it is famous for being a centre for carbon neutrality excellence.
- Transition to e-commerce plays a role in achieving net carbon zero as numerous individual journeys are replaced by fewer journeys by distributors.
- The Plan should support the requirements of the logistics sector to ensure all aspects of distribution are made as efficient as possible, e.g. last mile delivery by sustainable modes

It is important to try and encourage greener businesses into the area as well as encouraging existing businesses to become greener and to have the opportunity for greener initiatives. Businesses may choose to do this in several different ways, for example looking at active travel promotion for employees, adapting existing buildings and looking at new buildings to become more energy efficient. However, the downside to this could mean that businesses find this challenging due to costs, and as such a just transition period is likely to be needed.

The location and accessibility of new facilities relative to their suppliers and customers can help make substantial reductions and a significant contribution towards the goal of net zero. Whilst many existing commercial buildings may not achieve optimal energy efficiency, there is considerable scope for industry to play a key role in harnessing renewable energy generation.

Current adopted and emerging policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford Core Strategy	-	-	There are currently no existing policies in relation to a Green Economy.
Warwick District Local Plan	-	-	There are currently no existing policies in relation to a Green Economy.
The Warwick District Council Net Zero Carbon Development Plan Document (DPD) Consultation Draft (April 2022)	Policies NZC1-4.	Various	Aims to minimise carbon emissions from new buildings within the District to support the achievement of national and local carbon reduction targets

Q-E2: Please select all options which are appropriate for South Warwickshire

Option E2a: Include a policy which encourages businesses to be low carbon

This could be in terms of their use of materials, promotion of active travel initiatives for employees and the use of clean technologies in construction and in infrastructure delivery, their buildings, transport arrangements, supporting development of clean technology clusters close to innovation areas and identifying sites suitable for material reuse hubs to support a circular economy. The policy could also include prioritisation for businesses looking to use low carbon infrastructure such as renewable energy. This would be a new policy in response to the need to address climate change as neither Core Strategy or Local Plan currently has a specific policy on this.

Option E2b: Do not include a policy encouraging businesses to be low carbon

It is acknowledged that it could be difficult and costly for some businesses to become greener especially if it involves retrofitting. As there is still a strong emphasis on maintaining a thriving economy, it is important not to discourage businesses to the area.

Option E2c: Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy.

This would help to brand South Warwickshire as a place where green businesses may wish to locate to. It would be a new policy in response to the need to address climate change.

Issue E3: Diversifying the economy

What you said:

- Will help to prevent out-commuting and retain residents within South Warwickshire.
- The four principles are subservient to boosting and diversifying the economy.

It is important to ensure that South Warwickshire is attracting a mix of employment to the area which will help to prevent out-commuting and retain residents within South Warwickshire. Typically, Stratford and Warwick have many people employed in the hospitality, retail and tourism sectors which traditionally are much lower paid with those tending to be younger people who are starting work or who are studying and working part-time to supplement their income.

South Warwickshire also has an existing high skilled and qualified workforce and this is something that we should look to continue to support especially for younger people. There could be an opportunity to look at a S106 agreement for large scale developments whereby developers contribute towards the recruitment and training of local people through various initiatives. The training schemes could be targeted at those disadvantaged groups to allow them to gain the necessary skills to increase their access to job opportunities.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.22	121	The policy sets out the criteria for economic activity within Stratford including support for business and commercial activity in sustainable locations. It also includes information on how much employment provision will need to be provided.
Warwick District Local Plan	DS1	15	The policy aims to ensure that there is sufficient and appropriate employment land available to meet the existing and future needs of businesses.
Warwick District Local Plan	PC0	37	The policy supports activity that promotes sustainable development to support a thriving and vibrant economy through several principles.
Warwick District Local Plan	EC1	39	This sets out the criteria for employment in both urban and rural areas.
Warwick District Local Plan	EC2	41	This policy looks at diversification of agricultural and rural businesses and sets out key criteria.

Q-E3: Please select all options which are appropriate for South Warwickshire

Option E3a: Include a policy expanding on SDC’s current existing policy.

This sets out the principles for economic activity within South Warwickshire and would also include setting out how much employment provision would need to be provided.

Option E3b: Have separate policies for individual sectors.

These would set out criteria for economic activity including how much employment provision should be provided for each sector and may need to be adapted depending on whether the area is urban or rural.

Option E3c: Include a policy that secures employment strategies through S106.

This would look at a strategy which would indicate how developers would promote employment and skills at certain stages of the development process for local people. For example, it could be a percentage of jobs are advertised to local people only. It would help to retain local skills and provide jobs for local people.

Option E3d: None of these

Issue E4: Sustaining a rural economy

Over half the population of South Warwickshire lives outside of the main urban areas. Whilst many of these residents will commute to these urban areas or outside the District for work, a proportion are employed in the rural economy. The rural economy comprises both land-based / agricultural businesses as well as those general business who operate from a rural location.

Travel to places of work by public transport in South Warwickshire is difficult due to its rural nature and the lack of regular and reliable bus services. It can hinder any job opportunities for people both in Warwick and Stratford district and with Stratford having a predominantly older population, businesses often look to locate in the north of the country where labour supply is better.

One solution is, through the South Warwickshire Local Plan, to look at some alternative sustainable modes of transport in these more rural areas such as mobility hubs, demand responsive transport services and an improvement to rail and active travel, in order to improve accessibility to key employment centres (see Chapter 10). Alternatively, the South Warwickshire Local Plan can explore the diversification of the rural economy.

There are challenges facing agricultural businesses such as having the capital to invest, restrictions from planning legislation, connectivity in rural areas and labour shortages. An important consideration is the skills and training alongside this in order to support any new economic sectors. It is also important that existing businesses are supported as well as developing new business/employment sectors.

With appropriate diversification, businesses may be able to have greater resilience by providing a range of income generating streams. For example, farm shops and tourism can supplement agricultural income which can create new jobs and help sustain the vitality of rural communities. Innovation surrounding technology can also help to support agricultural and rural businesses in

adapting to changing circumstances, including helping to address climate change and increasing biodiversity. Farm diversification will, however, most likely mean increased vehicular traffic to and from farms. Another component of the rural economy is the provision of general employment opportunities in rural locations, including within villages, perhaps through the conversion of historic farm buildings that are no longer suited to modern agricultural uses. Again, such schemes, although not significant in themselves can help sustain rural communities.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	AS.10	192	The policy sets out criteria for activities and development in the rural parts of the District including how they will maintain the vitality of rural communities and contribute towards a strong rural economy.
Warwick District Local Plan	EC1	39	Part two of the policy sets out under which circumstances new employment would be permitted in rural areas.
Warwick District Local Plan	EC.2	41	This policy sets out the criteria for diversification of agricultural and land use rural based businesses.
Warwick District Local Plan	TC17	53	There is a paragraph within this policy which sets out the criteria for rural shops and services and what would need to be provided where there would be a loss to local service/retail needs.
Warwick District Local Plan	TC18	55	Policy which supports new farm shops but only where they would not have an adverse impact on existing rural shops in the local area.

Q-E4.1: Please select the option which is most appropriate for South Warwickshire

Option E4.1a: Include a policy supporting diversification.

This would set out criteria of how rural businesses and agricultural diversification will be supported. The policy could expand one existing policies and be a combination of what is currently in Stratford’s Core Strategy and Warwick’s Local Plan.

Option E4.1b: Do not include a specific policy on diversification.

This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.

Q-E4.2: Please select the option which is most appropriate for South Warwickshire

Option E4.2a: Include a policy supporting small-scale employment opportunities in rural areas

This would encourage small businesses to be to grow in more rural areas of South Warwickshire which in turn would help to contribute and sustain the local economy.

Option E4.2b: Do not include a policy supporting small-scale employment opportunities in rural areas

This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.

Issue E5: Lack of business accommodation

In South Warwickshire, office accommodation is at a premium and there is an identified issue regarding a lack of grow-on space for businesses to expand. Changing requirements have led to higher demand for hybrid work spaces, and higher quality office space. There is a move towards cellular offices, with these in demand particularly for 2 or 3 people, rather than co-working space. As well as a demand for larger commercial units, there is an ongoing requirement for small industrial starter units. In terms of location, there is a growing preference for town centres rather than out of town business parks.

In Leamington Spa, the gaming industry in particular is experiencing pressures for office space. In the wider market, there is a need for both large and small spaces. One issue identified is businesses who would prefer to move into bigger premises being unable to do so, thus reducing the availability of smaller units for smaller businesses and start-ups.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Site Allocations Plan Core Strategy	SAP.9	67	There is a policy (Policy SAP.9) in the emerging Site Allocation plan (SAP) in relation to business use, as well as reference to business accommodation in explanatory text to a number of policies within the Core Strategy.
Warwick District Local Plan	-	-	There isn't a specific policy in relation to securing business accommodation for specific needs. However, reference is made to business accommodation in explanatory text to a number of policies within the Local Plan.

Q-E5: Please select the option which is most appropriate for South Warwickshire

Option E5a: Include a policy which supports a range of business units.

This policy would encourage business units of differing sizes including smaller units for those businesses looking to start up. It is often difficult for small businesses to find affordable and available premises. This would be a new approach as currently there aren’t any specific existing policies in relation to this in either the Core Strategy or Local Plan.

Option E5b: Do not include a policy in Part 1.

This level of detail may be considered beyond the scope of the Part 1 plan. Existing detailed policies may be ‘saved’ and subsequently incorporated into a Part 2 plan and/or other policy documents as appropriate.

Issue E6: Protecting South Warwickshire’s economic assets

South Warwickshire benefits from a number of economic assets that, together, comprise the foundation of the South Warwickshire local economy. This local plan, along with the Economic Strategy, seek to capitalise on these assets and maximise their economic potential. There is not currently a policy in either the Local Plan or Core Strategy which protects all these unique assets, however there are policies which refer to some of these assets and look to protect them, for example, Wellesbourne Airfield.

Unique economic assets in South Warwickshire include:

Silicon Spa – It is the home of the gaming industry. This extends from Leamington out to the surrounding areas of Southam and Warwick employing over 2,000 highly skilled people.

Automotive – Home to the UK’s automotive industry. Coventry and Warwickshire has a reputation for being a world class centre for advanced manufacturing and engineering. Aston Martin, JLR and Lotus have a major presence in South Warwickshire. Manufacturing accounts for over 40% GVA in Stratford.

Highly Skilled Workforce – South Warwickshire has a well-qualified and skilled workforce which attracts businesses. Warwick and Stratford have a higher-than-average population with NVQ4 qualifications and above.

Food and Drink – Food and drink is important to the economy and Warwickshire is well known for its quality restaurants, locally produced artisan food and drink, farm shops delicatessens and café culture.

UK Battery Innovation Centre – This is part of a government programme to fast track the development of cost-effective, high performance, durable, safe, low-weight and recyclable batteries. It provides the missing link between prototype battery technology and successful mass production.

WASPS – Top Premiership Rugby Union club moved from London to their current home at the Coventry Building Society Arena in 2014.

Bowls England – The HQ of Bowls England is in Leamington and each year hosts the National Bowls Championships.

Cotswolds National Landscape – This is the third largest protected landscape in England which is popular with walkers and visitors to the area.

Wellesbourne Airfield – The airfield operates as a general aviation airfield which is home to private aircraft and a flying school. It is in close proximity to the University of Warwick and provides the ideal opportunity to attract inward investment as a centre for aviation innovation.

University of Warwick – The main campus is located south of Coventry, and it has an additional campus at Wellesbourne which provides research and education in engineering, manufacturing and technology.

Long Marston Rail Innovation Centre – This is the home to the UK’s only circular standard-gauge railway test track and is a base for the University of Birmingham and the Rail Alliance. The Rail Innovation Centre is emerging as a leading cluster in sustainable and digital rail technology through collaborative working with SMEs.

Shakespeare Birthplace – A popular attraction for overseas and UK visitors and is situated in the heart of Stratford-upon-Avon.

Stoneleigh Park – A science and innovation park which is dedicated to the future of farming and home to over 60 businesses.

Castles and Country Estates – South Warwickshire is home to a number of significant country estates as well as Warwick and Kenilworth castle, both of which are major tourist attractions.

Rosalind Franklin Laboratory – The UK’s first testing megalab and one of the centrepieces of UK’s future test and trace infrastructure. When fully staffed, the laboratory will play a key role in providing employment opportunities in the local area creating up to 1,500 jobs.

Royal Shakespeare Company – It is a major British theatre company employing over 1,000 staff and producing around 20 theatrical productions each year.

Agriculture – Warwickshire is home to a diverse range of farming, food and drink businesses and is approximately 70% agricultural land. Agriculture is important to South Warwickshire as it contributes to the local economy, local communities, protects the local environment and is a large employer to local people.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Council Core Strategy	AS.9.2	181	This policy requires the flying functions and aviation related facilities at Wellesbourne Airfield to be retained.

Q-E6: Please select the option which is most appropriate for South Warwickshire

Option E6a: Include a policy which protects South Warwickshire’s economic assets.

As these assets are a major contributor to the economy, it may be appropriate to protect their current use to support them and ensure that the right investment is made in these areas. However, such a policy might hinder alternative uses if the current needs change.

Option E6b: Do not include a policy protecting all these economic assets.

This could mean that there would be a loss to the economy if some of these assets are not protected and are lost to other uses. It may be that some of these assets would be covered under alternative policies, or the view may be taken that specific protection is not needed. Alternatively, protecting these assets could be seen as beyond the scope of part one of the plan, and instead be considered in part two of the Plan.

Issue E7: Core Opportunity Area and Major Investment Sites

A Core Opportunity Area has been identified which is shown on Figure 21 below. This comprises the 5 main towns, the A46 Trans Midlands Trade Corridor and the central section of the M40. The university of Warwick’s two campuses, Long Marston Garden Village and Rail Innovation Centre, Stoneleigh Park and the automotive hub at Gaydon.

The Core Opportunity Area looks to attract inward investment to drive the South Warwickshire economy as well as encourage inward investment in the most accessible parts of South Warwickshire.

Major investment sites within the Core Opportunity Area include:

- University of Warwick main campus area
- South of Coventry including Coventry Airport, Coventry Gateway and the National Battery Innovation Centre
- Wellesbourne including University of Warwick and Wellesbourne Airfield
- Long Marston area including the Long Marston Rail Innovation Centre
- Stoneleigh area including Stoneleigh Park agricultural science park
- Gaydon M40 J12 area including Jaguar Land Rover and Aston Martin Lagonda

University of Warwick Main Campus Area

South of Coventry Area

Wellesbourne Area

Wellesbourne is home to the adjacent sites of Wellesbourne Airfield and the University of Warwick’s Wellesbourne Campus. Aviation uses at the airfield are safeguarded in the Core Strategy and the draft Site Allocations Plan is promoting investment growth at the Campus site.

Looking forwards, we see an integral relationship between the university campus and airfield site, with the campus growing as a centre for cross-fertilisation research and development in high-tech automotive, battery and biosciences. The proximity of an operational airfield will enable these technologies to exploit the potential that aviation technology can add to these scientific endeavours. With the possibility for some rationalisation and rearrangement of activities, the airfield site also has the potential to house further industrial and research and development activities related to the campus (i.e. Use Class B2).

Long Marston Area

The Long Marston Rail Innovation Centre is the UK’s only looped test track and with its connection to the national rail network, provides a unique opportunity to act as a catalyst for growth in the rail technology sector. Although not one of the UK’s traditional rail centres, this part of South Warwickshire it has the potential to exploit the interrelationships with the industry Coventry and Warwickshire is world famous for; automotive and advanced engineering, especially in respect of alternative fuel technology. Existing opportunities in the Long Marston Area also include the employment land on Long Marston Airfield Garden Village and safeguarding the Rail Innovation Centre for rail-based employment and research and development.

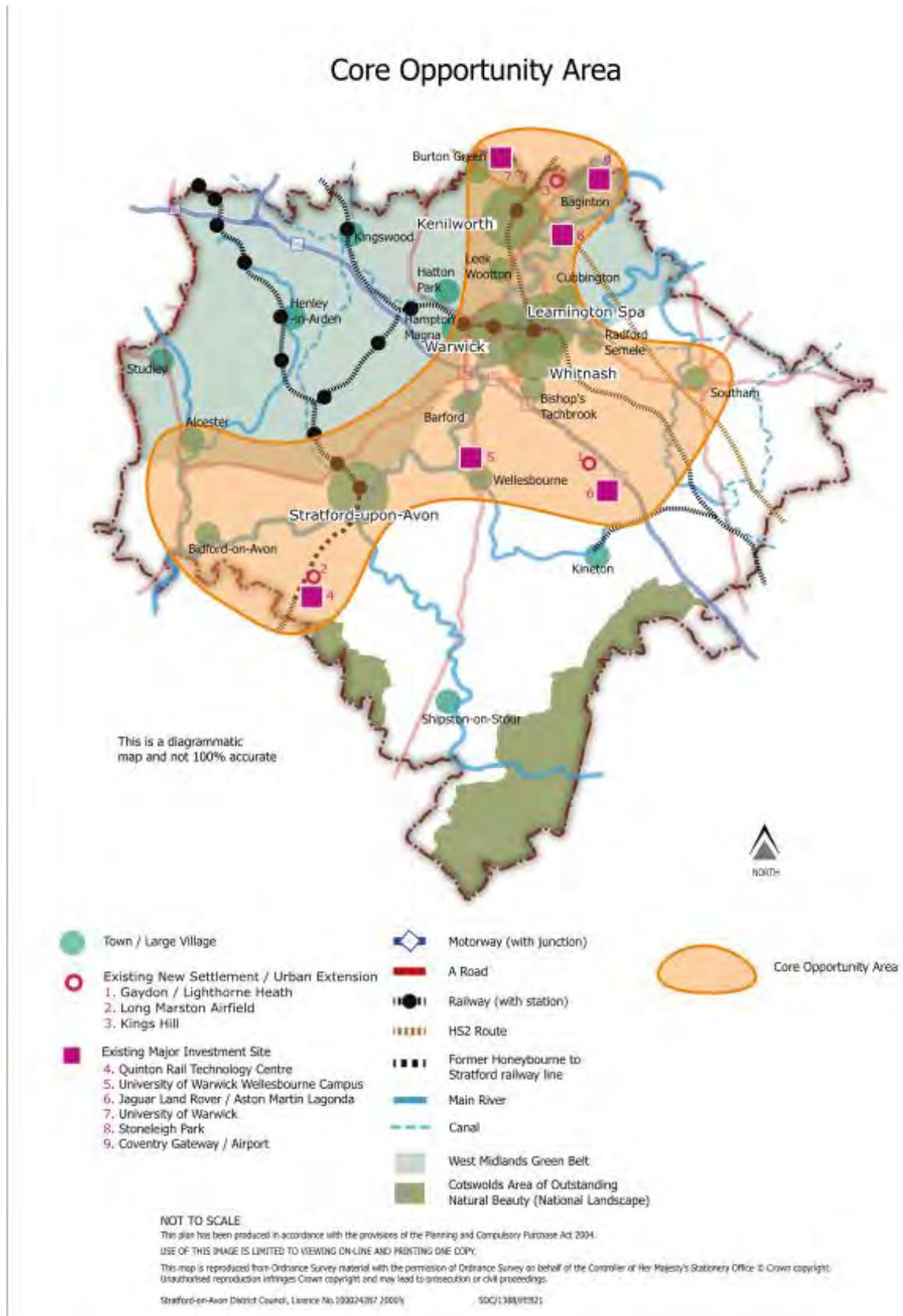
Stoneleigh Area

Gaydon Area / M40 Junction 12

This automotive hub is home to the iconic British brands Jaguar Land Rover and Aston Martin Lagonda. In addition to the economic activities on the Gaydon proving ground, circa 105ha of land has been allocated in the Core Strategy for employment purposes. Through the SWLP, there is an opportunity to capitalise on the existing economic base and grow this area with further automotive-related manufacturing (i.e. Use Class B2). Whilst well-located to the M40, we do not see this location as appropriate for strategic logistic uses (i.e. Use Class B8).

If additional employment land is to be allocated in the Gaydon area, there is the potential to reconsider the specific use of the existing allocations. The ability to bring forward employment sites the scale of 100ha is of regional West Midlands importance, and the potential for automotive or automotive related investment would reaffirm the West Midlands as the home of the British automotive industry.

Figure 21 - Core Opportunity Area



Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.22	121	There isn't a specific policy on Core Opportunity Areas as this is a new proposal. However, the economic policy sets out the criteria for economic activity within Stratford including support for business and commercial activity in sustainable locations. It also includes information on how much employment provision will need to be provided.
Stratford-on-Avon District Core Strategy	AS.9	181	Criterion C2 seeks to safeguard the airfield for aviation uses. Criterion C6 supports the use of the campus for research and development and educational purposes.
Stratford-on-Avon District Core Strategy	GLH	184	Proposal GLH relates to the creation of a new community of 3,000 homes, a local centre and 105ha of employment land.
	AS.11	199	Relating to Large Rural Brownfield Sites, this policy sets out a range of appropriate uses at the Gaydon site.
Warwick District Local Plan	DS1	15	There isn't a specific policy on Core Opportunity Areas. However, there are several policies in the existing Local Plan which aim to ensure that there is sufficient and appropriate employment land available to meet the existing and future needs of businesses.
Warwick District Local Plan	PC0	37	The policy supports activity that promotes sustainable development to support a thriving and vibrant economy through several principles.
Warwick District Local Plan	EC1	39	This sets out the criteria for employment in both urban and rural areas.
Warwick District Local Plan	EC2	41	This policy looks at diversification of agricultural and rural businesses and sets out key criteria.

Q-E7.1: Please select the option which is most appropriate for South Warwickshire

Option E7.1a: Include a policy directing employment to the Core Opportunity Area.

This policy would look to direct employment growth to the Core Opportunity Area with areas outside of this, providing opportunities for more local investment.

Option E7.1b: Do not include a policy directing employment to the Core Opportunity Area.

This could mean that South Warwickshire fails to capitalise on employment opportunities or that new investment is focused outside of the Core Opportunity Area and fails to capitalise on the connectivity that the core opportunity area brings.

Q-E7.2 Please select the option which is most appropriate for South Warwickshire

Option E7.2a: Include a policy relating to additional economic growth at the major investment sites.

This policy would seek to allocate additional land for specific employment uses at the major sites, including a list of development principles in order to create the right environment to secure major inward investment into South Warwickshire.

Option E7.2b: Do not include a policy relating to additional economic growth at the major investment sites.

This could mean that South Warwickshire fails to capitalise on employment opportunities. It could also undermine the presence of existing businesses as they find themselves unable to grow in the long-term. This could put existing jobs at risk.

Issue E8: Existing Employment Sites

The current local plans identify a number of sites for economic development. Given the desire to grow the South Warwickshire economy, and to provide certainty to residents, landowners, and investors alike, we propose to carry-over all existing employment allocations into the SWLP.

However, there is one existing allocation that we think should be reviewed in order to better reflect changing circumstances, namely Land at Atherstone Airfield, near Stratford-upon-Avon. Currently, use of the site is restricted to businesses relocating from elsewhere in Stratford-on-Avon District (e.g. Stratford-on-Avon Canal Quarter). Whilst this remains an important objective, we think that relocation is an insufficient incentive to bring forward the site. To ensure that the objective is still achieved, part of the site could be retained for relocating businesses once the site had been developed for new businesses coming into the area.

In addition to designated employment sites, South Warwickshire benefits from thousands of premises in business use across the full range of sectors, whether office, industrial, retail or hospitality uses. Whilst national planning policy is clear that we cannot arbitrarily resist the change of use of such premises, it is legitimate to ensure that as the local planning authorities, we should be satisfied that all reasonable endeavours have been explored prior to change of use. Reasonable endeavours include a satisfactory marketing period with the property marketed at an appropriate value, an independent viability assessment and consideration of a range of alternative commercial uses.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.22	121	Economic development promoted in sustainable locations Provision to be made for at least 35ha of employment land primarily for B1a and B1b Further 19ha in allocations REDD1 and REDD2 100ha at GLH to enable expansion of JLR and 4.5ha for Aston Martin Lagonda Flexible approach to accommodating wide range of employment generating uses. Loss of employment uses resisted unless not longer viable or appropriate. Knowledge based and other high value added sectors encouraged.
Stratford-on-Avon District Core Strategy	CS.25A	207	Part A of this policy seeks to retain existing community facilities such as shops, pubs, medical and leisure facilities given the important role they play in local communities.
Warwick District Local Plan	DS9	21	Additional 19.7ha employment land to be allocated at 2 strategic sites – Thickhorn, Kenilworth (8ha) and Stratford Road, Warwick (11.7ha). 6.5ha to be accommodated at allocated sub-regional site
Warwick District Local Plan	DS16	29	235ha land in vicinity of Coventry Airport allocated as major employment site

Q-E8.1: Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP?

Y/N/DK.

This approach will provide investment certainty and ensure that we can continue to grow the local economy. If existing allocations are not included, we will need to find even more new greenfield sites across South Warwickshire to meet our employment needs.

Q-E8.2: If, no please list the sites that should be excluded and give reasons.

Q-E8.3: Do you agree that proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests?

Y/N/DK

Q-E8.4: Please specify what you consider to be appropriate tests

Issue E9: Supporting our changing town centres

What you said:

- Town Centres should be encouraging more opportunities for independent traders and small businesses including pop up facilities.
- The Council needs to support small independent shops setting up.
- Use Leamington’s independent shopping unit as a good example of independent trade within a town centre.
- Need to look at the vision for Town Centres in order to keep the community feel even if retail use is dropping.
- Town Centres should be a high priority and the Plan should develop a robust long-term framework which is regularly reviewed.
- Need to focus on repurposing Town Centres into mixed use areas which will bring employment in and reverse the trend of empty retail space to enable them to become vibrant places to live.
- Create Town Centres which are pleasant to be in and not dominated by traffic.
- Introduce parking charges at out-of-town retail parks and use this to subsidise town centre car parks.

Town Centres play an important part in supporting economic growth and encouraging investment. It is important to maintain the shopping function of town centres that enhance their respective roles within the local Retail Hierarchy. The NPPF would support planning policies which define a network and hierarchy of town centres in order to promote their long-term vitality and viability and to tackle climate change by minimising daily travel demand. Out of town retail parks and car-based superstores can increase people’s need to travel by car. A Town Centre study is being undertaken by consultants which will look at how much retail will need to be planned for over the Plan period as well as the functionality and vision for Town Centres. This will also look to identify locations of where more detailed information/Area Action Plans may be required. The results of this will be published in due course and will be used to inform the Preferred Option.

We believe that a hierarchical approach to retail is the best option to ensure that a vibrant town centre can be maintained whilst also recognising that some retail activity outside of the town centres may be better suited to certain businesses.

In order to ensure that the hierarchical approach can be implemented in the most appropriate way it would be useful to find out whether you think the Local Plan

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	Policies map	N/A	“Town / Village Centre Boundary” is defined for Stratford-upon-Avon and the eight Main Rural Centres. “Primary Shopping Area” is defined within Stratford-upon-Avon town centre. Note that in the case of Stratford-upon-Avon, the boundary of the retail area is not defined on the policies map. The Town Centre Boundary includes areas which are not primarily in retail use, while the Primary Shopping Area is focussed on a small number of central streets.
Stratford-on-Avon District Core Strategy	CS.23	127	The policy currently requires large scale retail exceeding 1,000 square metres and convenience retail exceeding 2,500 square metres to be located within or on the edge of Stratford town centre, or the commercial core of a Main Rural Centre. Any large-scale retail proposal that is promoted elsewhere in the District requires a comprehensive Retail Impact Assessment.
Warwick District Local Plan	Policies map	N/A	“Town Centre Boundary” is defined for Leamington Spa, Warwick and Kenilworth. “Retail Area” is defined for the same three towns. In the case of Leamington Spa and Warwick, this is considerably smaller than the Town Centre Boundary; in Kenilworth the two boundaries are identical. “Primary Retail Frontages” are defined for the same three towns. These focus on a small number of streets within each Retail Area.
Warwick District Local Plan	TC2	45	The policy requires new retail development to be located as a preference in the retail areas defined on the policies map. Where there are no suitable sites available in the preferred locations out of centre sites will be considered. Sites on the edge of retail areas will be prioritised in terms of their accessibility with the retail area.

Q-E9: Please select the option which is most appropriate for South Warwickshire

Option E9a: Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan.

In order for the hierarchical approach to be implemented effectively it may be useful to identify retail areas within each of the Town Centres as well as Town Centre boundaries. This would follow the current Warwick District Local Plan approach whereas currently Stratford does not currently identify these. It would allow consistency across South Warwickshire.

Option E9b: Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2.

This may not be considered a strategic matter for Part 1 to address. However, saving existing boundaries would result in an inconsistent approach across the two Districts.

Issue E10: Tourism

What you said:

- Emphasis on sustainable tourism, and climate-friendly practices. Concerns over the carbon emissions created through long distance travel.
- Some felt that tourism should be strengthened/diversified, however there were also concerns that there is too much reliance on tourism
- Support for the need of additional guest accommodation to help with the provision and vitality of other services, however questions were raised regarding the evidence base to support this need.
- Concerns over day trippers who do not support the local economy

South Warwickshire, with its historic and cultural assets as well as beautiful landscapes is a key destination for tourists, and therefore it is important that the South Warwickshire Local Plan contains policies relating to this. Tourism makes up a significant chunk of the area’s economy, and it will be important to support this where possible. One particular issue in relation to tourism is the lack of affordable accommodation, which prevents larger tour groups staying overnight, resulting in many ‘day trippers’. Day trippers are known to spend less within the town, with those staying overnight spending on average £400 in comparison to £40. This issue also extends to the provision of accommodation for conferences and other business uses.

Another issue related by proxy to tourism is the provision of cultural facilities such as museums, theatres, and music venues, which are not only an attraction for tourists but also residents, and supporting them can help improve the local economy. It will be important that the local plan helps create the conditions to have a thriving heritage and culture sector that not only helps create a sense of place, but helps encourage visitors to the local plan area, and increases enjoyment for those already in it.

Whilst tourism is an important issue that the Local plan will need to address, it is not felt that tourism plays a spatially strategic role, and should therefore be addressed in part 2 of the South Warwickshire Local Plan.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.24	132	Where appropriate the role of tourism will be increased by supporting the growth and improvement of existing attractions and by encouraging new attractions and dispersing them throughout the District. Visitor attractions, overnight accommodation and conference facilities should be located within the urban areas of Stratford-upon-Avon or a Main Rural Centre
Stratford-on-Avon District Core Strategy	CT1	56	New meeting places, tourism, leisure, cultural and sports development will be permitted in the town centres in accordance with the town centre policies (policies TC1 to TC18). Where suitable sites are not available in town centres, sites in edge-of-centre locations will be considered and, if no suitable sites are available in any

			of the preferred locations, out-of-centre sites will be considered.
Warwick District Local Plan	CT2	57	New or extended hotels will be permitted in the town centres in accordance with the town centre policies (policies TC1 to TC18) and Policy CT1 and where it can be demonstrated that the development is easily accessible using sustainable forms of transport. Visitor accommodation within rural areas will be permitted where it is located within the Growth Villages or is for the conversion of a rural building. All visitor accommodation in rural areas should be of a proportionate scale, appropriate in relation to surrounding uses, should not generate significant volumes of traffic and should not harm the character of the area.
Warwick District Local Plan	CT3	58	Redevelopment or change of use from visitor accommodation at ground floor level within the town centres will only be permitted where it can be demonstrated that the site is within an identified retail area, there is evidence of adequate capacity to meet need within alternative accommodation or the accommodation is no longer viable and no other parties are willing to acquire it for that use
Warwick District Local Plan	CT4	58	Extensions to or intensification of tourism, cultural or leisure facilities in rural areas will be permitted where these do not establish new uses which are not ancillary to the normal business of the operation, generate significant volumes of additional traffic or harm the character of the area.

Q-E10: Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan? Y/N/DK

Whilst Tourism is essential to the vitality of South Warwickshire, there are few aspects of tourism that have an effect on the spatial planning of an area. It is therefore proposed that tourism is addressed fully, within Part 2 of the South Warwickshire Local Plan.

Issue E11: Any other economic issues

Q-E11: Please add any comments you wish to make about delivering South Warwickshire’s economic needs

6: Delivering homes that meet the needs of all our communities

Chapter 6 sets out various options as to how we might meet our housing challenges facing us to 2050 and seeks your views on the 6 key housing issues:

- [Issue H1: Providing the right number of new homes](#)
- [Issue H2: Providing the right tenure and type of homes](#)
- [Issue H3: Providing the right size of homes](#)
- [Issue H4: Accommodating housing needs arising from outside of South Warwickshire](#)
- [Issue H5: Providing custom and self-build housing plots](#)
- [Issue H6: Pitches and plots for Gypsies and Travellers](#)

What you said:

- Both Districts have a housing affordability issue
- The Councils should deliver more affordable housing, through setting a higher percentage on new development and the Councils themselves becoming the building of affordable housing stock
- New affordable housing needs to meet climate change obligations
- Important to achieve the right mix of size and tenure of homes to help address affordability, as for example more specialist homes for older people can free up much needed family homes
- Needs to be flexibility in tenure and mix to meet changing market needs over the plan period
- Need to plan for mixed and balanced communities so that all have access to services and open space
- Provide a greater amount and mix of housing in the rural settlements so that there are opportunities for local people to stay in the same settlement
- Rural/community led housing schemes have an important role and contribution
- Reuse empty homes and second homes for affordable housing
- Suggest that housing requirement should go above the minimum in order to increase the supply of affordable housing to be delivered
- Should avoid building more homes unless it is proven to be essential

The Plan needs to allow for new homes that meet the diverse needs of all our residents, including affordable, student, old persons, specialist and self and custom build housing, along with the accommodation needs of gypsy and traveller and travelling showpeople communities. Within Warwick there is a younger demographic of people due to the proximity of the university and the gaming industry in the area. Some of these are in lower paid jobs and are travelling into the area from places such as Coventry as they can't afford to rent or live in Warwick or Leamington.

Providing new homes is important not only in South Warwickshire but nationally; it not only gives people a place to live but it also supports the local economy creating construction jobs, supporting

existing facilities and services so they remain open, making the area more attractive to local employers and promoting additional spending in the local economy. New homes also provide contributions to improve and provide new infrastructure such as schools and open spaces.

[The Stratford-on-Avon District Housing Strategy \(2021-2026\)](#) identifies the housing challenges facing the District and sets out what the Council and its partners must do to tackle them. It sets out three aims and the Local Plan has a role in helping to aspects of this:

1. To support communities and build sustainable affordable homes
2. To improve existing housing and help people live independently
3. To prevent homelessness and reduce the harm caused by it

[The Warwick District Housing Strategy \(2014-17\)](#) identifies a number of objectives through which the Local Plan can contribute:

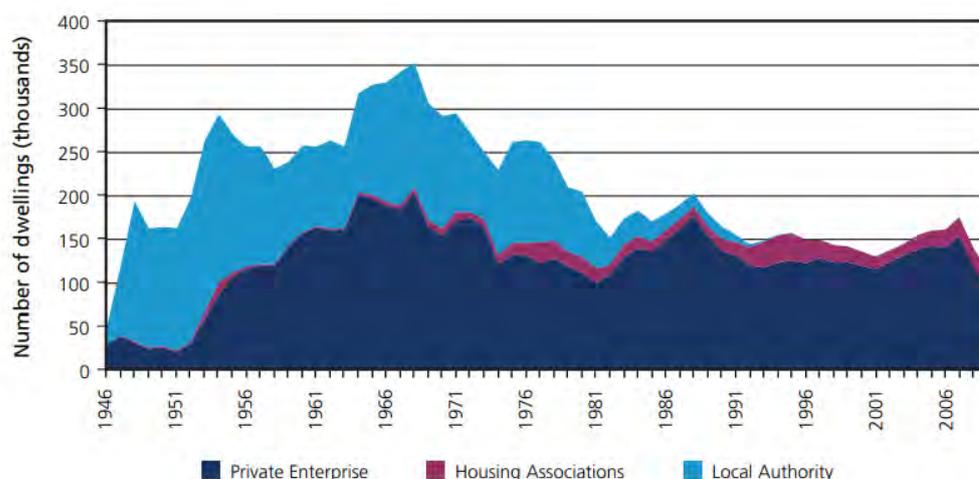
1. Enabling and providing services that help people to sustain their homes
2. Meeting the need for housing across the district
3. Raising standards of management, repair and improvement of existing housing and neighbourhoods

Issue H1: Providing the right number of new homes

England is experiencing a housing crisis and our current local plans are working to help address this issue by delivering high levels of both market and affordable homes. Both Councils have delivered record levels of housing growth in recent years demonstrating that the two Local Plans are effectively delivering on our housing ambitions. View the current [Stratford-on-Avon](#) and [Warwick](#) District housing trajectories.

The graph in Figure 22 shows the national perspective and highlights that the cause of the crisis nationally has been a failure in the supply of affordable homes to achieve the Government’s target of 300,000 homes annually.

Figure 22: House building: permanent dwellings completed, by tenure, England, historical calendar year series



(Sources: P2 returns from local authorities (DCLG), National House-Building Council (NHBC))

Importantly, the issue is not just one of supply, specifically and crucially, it is an issue to do with the lack of affordable housing supply. Building lots and lots of (unaffordable) market homes will not address this issue. Whilst we do need to build some market homes, the local plan needs to explore ways of significantly increasing the delivery of affordable homes across South Warwickshire. To determine the minimum number of homes needed, the Local Plan needs to be informed by an assessment of local housing need. In order to gain an understanding of what the housing need is for South Warwickshire up to 2050, an up-to-date [Housing and Economic Development Needs Assessment \(HEDNA\)](#) has been produced for the whole of Coventry and Warwickshire using the latest information from the 2021 Census.

The starting point for assessing housing need is the standard method set out in Planning Practice Guidance. This uses, as its baseline, the 2014-based household growth projections produced by the Office for National Statistics (ONS). The standard method then uses a prescribed approach which includes applying an uplift to this based on the relative housing affordability position of individual local authorities. For cities such as Coventry, a further 35% uplift is also applied.

The Standard Method calculation identifies a need for 5,554 dwellings annually across Coventry and Warwickshire. However there have been recognised issues with estimating and projecting the population in Coventry. The initial 2021 Census data (released in June 2022) supports this.

The HEDNA has therefore modelled new demographic projections which take account of the initial Census data releases, and seeks to assess how the population can be expected to change over time by applying more up-to-date assumptions about fertility, mortality and household formation rates. The HEDNA then applies these alternative projections through the framework provided by the standard method.

The results of the housing needs modelling undertaken are shown in Table 9. The new trend-based projections point to a need for 4,906 dwellings annually across the sub-region. This is lower than the 5,554 per annum Standard Method figure due to the recognised issues with population data which have informed previous projections for Coventry.

Importantly, the demographic growth projections also support sufficient growth in labour supply across Coventry and Warwickshire as a whole.

Table 9: Overall Housing Need in Coventry and Warwickshire (dwellings per annum)

	2014-based projection	Trend-based projection
Coventry	3,188	1,964
North Warwickshire	176	119
Nuneaton & Bedworth	435	409
Rugby	516	735
Stratford-on-Avon	564	868
Warwick	675	811
Housing Market Area	5,554	4,906

(Source: Table 15.1, Coventry & Warwickshire HEDNA, Icen Consulting)

Given across the sub-region that population figures have been over-estimated for many years, it is reasonable and expected that any alternative trend-based projection would show a lower need. What is apparent, however, is that the need is not lower in all areas within the Housing Market Area, and both Stratford-on-Avon and Warwick Districts are likely to see higher levels of growth.

However, it also needs to be remembered that the total amount of housing that the Local Plan will need to provide will also include an agreed proportion of any need from Greater Birmingham & the Black Country and from Coventry that cannot be accommodated within those areas. In the current Warwick District Local Plan, for example, 332 homes per year need to be provided to meet Coventry's housing needs. As the figures in the above table show, the overall housing need in Coventry is lower in the HEDNA (compared to the previous 2014-based projections). Therefore, it follows that the Local Plan will be likely to need to accommodate fewer additional homes from Coventry based on these figures. This issue is considered further below under issue H4 (accommodating housing need arising from outside of South Warwickshire).

It should also be noted that the above figures represent levels of need – they do not reflect any assessment of whether those needs can be met within each local authority area. In preparing the South Warwickshire Local Plan, we are bound by our responsibilities under the Duty to Co-operate. This is a legal test we must pass in order for the plan to pass successfully through the examination process, adopted and come into force. The Duty to Co-operate requires us to work proactively and positively with other councils and statutory bodies to effectively address strategic cross-boundary matters. The issue of housing shortfalls is one such matter.

As such, whilst it may be tempting to want to apply the 2014-based figures because they are lower for South Warwickshire, given that Coventry looks unable to accommodate all of its own housing needs, it would most likely fall to South Warwickshire to accommodate a significant quantum of that need. The outcome would then most likely be similar levels of housing as shown in the 10-year trend-based projection. Section H4 of this consultation document deals specifically with the issue of housing shortfalls from outside South Warwickshire.

An added disadvantage of using the 2014-based projection would be that the South Warwickshire Local Plan was predicated on figures based on erroneous assumptions that have been proven to be wrong.

Work is ongoing to confirm how much housing can be provided from various sources both in terms of existing and future capacity to help meet the need, this includes an understanding what has already been built, has planning permission or is identified for development in existing Plans and the capacity of small 'windfall' sites.

Future capacity will have regard to both identified and windfall sites, and work is ongoing to assess the sites submitted in the 2021 'Call for Sites' exercise in order to consider their availability, suitability and deliverability as part of the Housing and Economic Land Availability Assessment (HELAA). In addition, potential capacity identified through the Urban Capacity Study will help inform the overall capacity potential.

From this it will be possible to identify the supply of specific sites and broad locations between years 1-5, 6-10 and where possible later years of the plan. A trajectory will illustrate the expected rate of housing delivery over the plan period and identify and anticipated rates of delivery for specific strategic sites.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS16	90	To meet the objectively assessed need to be distributed in line with CS15. Strategic allocations listed NDPs encouraged to identify sites to meet or exceed housing requirements Phasing and Delivery as per trajectory Site Allocation Plan will identify Reserve Housing Sites to meet agreed housing requirement inc. that arising in C&W HMA and to need arising outside of C&W. Criteria for when Reserve Sites will be released.
Warwick District Local Plan	DS2	15	The Council will provide in full for the objectively assessed housing need of the District and for unmet housing need arising from outside the district where this has been agreed.

Q-H1-1: The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?

Y/N/DK

Q-H1-2: If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?

Issue H2: Providing the right tenure and type of homes

What you said:

- Agree with recognition that there is no ‘one size fits all’ for housing
- Building more houses doesn’t drive prices down
- Reference made to unattractive urban sprawl in some locations
- Need highlighted to derive a robust housing need figure
- Particular challenges of affordability in South Warwickshire
- Desire for greater intervention however some respondents advocate for a more flexible approach based on responding to an up-to-date evidence base.
- Location of housing – accessing affordable housing in rural areas identified as an issue
- Support for directing housing to brownfield sites
- In terms of housing size view that there are too many large houses and there should be more emphasis on 1 and 2 bedroom properties
- Need to encourage people to live in appropriately sized homes for their needs
- The need for specialist and specific types of housing needs to be identified and allocated so that it is met.
- Broad support for bungalow provision expressed
- The need for authorised Gypsy and Traveller accommodation needs to be addressed
- Consideration should be given to the extent to which Park Homes needs to be controlled and managed
- Loss of family homes to student accommodation and Houses of Multiple Occupation raised as a concern
- Tenure should be influenced by local need and circumstances
- Suggestion for lifetime homes standards and national space standards

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS18	102	Affordable Housing requirements and thresholds dependent on location. Requirement for 35% Requirements relating to onsite provision, affordability and tenure, on-site integration and delivery.
Stratford-on-Avon District Core Strategy	CS19	110	New homes to contribute to balanced and sustainable communities by meeting identified local and district housing needs in terms of mix, size, tenure and type. Preferred type and mix for general needs housing set out. Specialist accommodation supported if meets a range of listed criteria. Flexible design encouraged
Warwick District Local Plan	H2	67	Developments of 11+ or floorspace of 1,000sq m requires 40% affordable housing Details of provision and viability considerations at planning application stage, range of defined criteria to be considered. Exceptional circumstances for off-site contributions.

Warwick District Local Plan	H4	72	Proposals required to include a mix of market housing that contributes towards a balance of house types and sizes across the district in accordance with latest SHMA. Range of defined circumstances to take into account
Warwick District Local Plan	H5	73	Permissions granted where a range of defined criteria are met
Warwick District Local Plan	H6	74	Permission only granted if a range of criteria are satisfied. Certain exceptions may apply

Housing affordability affects the ability of younger people to get onto the housing ladder and for people who work in the area to live locally.

Affordable housing is an umbrella term that encompasses lots of different tenures of housing that are provided at a cost below market homes. It is important to understand and plan for what is most needed in South Warwickshire.

Similarly, there is an ongoing need for a wide range of specialist types of housing across South Warwickshire, such as that for disabled people, older people, students and single people.

Linked to both of these issues is the mix and type of housing that is being provided in terms of how many bedrooms they contain and whether they are flats, houses or bungalows. Getting this right is crucial to meeting our overall housing needs, both in relation to open market housing and also in relation to affordable and specialist housing. As noted above, ensuring that we have the right homes to meet our job aspirations is not just about the issue of *how many* homes we build; it is about the type and tenure of homes that we build.

The HEDNA considers the need for affordable housing across South Warwickshire and these requirements are set out in Table 10. Importantly, the HEDNA notes that these figures should be considered for reference purposes and should not directly inform decisions about an appropriate mix as this will in part be informed by viability considerations as well as national affordable housing policy initiatives and funding availability. Furthermore, within the figure for rented affordable housing, the HEDNA estimates that 56% comes from existing households who need a different form of tenure (such as households in the private rented sector).

Table 10: Net Affordable Housing Needs (per annum)

	Rented Affordable Need	Affordable Home Ownership Need	Total Affordable Need
Stratford-on-Avon	419	129	547
Warwick	582	258	839

(Source: Table 8.45, Coventry & Warwickshire HEDNA, Icen Consulting)

Affordable homes are offered to those eligible households on the housing register. Currently, the primary way that affordable housing is delivered is as a percentage component of market housing schemes. The presumption is also that such provision should be provided onsite.

Currently, the affordable homes provided contribute towards addressing District-wide needs. As such, a household with local connections in Alcester may be offered a home in Southam.

It is important to understand where the need for different types and tenures of housing is arising so that policies can be targeted to aim to address the need locationally as much as possible. The South Warwickshire Local Plan is an opportunity to revisit how affordable housing policy is implemented to 2050.

Table 10 shows the estimated needs for different types of housing linked to the population projections as set out in the HEDNA. The analysis is separated into the various different types and tenures although it should be recognised that there could be some overlap between categories (i.e. some households might be suited to more than one type of accommodation).

Overall, the analysis suggests that there will be a need of 234 homes per annum for both housing with support and housing with care (in both market and affordable sectors). In addition, there is an additional need for 42 nursing and residential care bedspaces per annum.

Table 11: Older Persons Needs to 2032

	<i>Housing with Care / Support</i>	<i>Bedspace Allowance</i>	<i>Total Need</i>
<i>Stratford-on-Avon</i>	175	29	204
<i>Warwick</i>	59	13	73

(Source: Table 14.17, Coventry & Warwickshire HEDNA, Icen Consulting)

It should also be noted that within any category of need there may be a range of products available. For example, many recent market extra-care schemes have tended to be focused towards the ‘top-end’ of the market and may have significant service charges (due to the level and quality of facilities and services). Such homes may therefore only be affordable to a small proportion of the potential market, and it will be important for the Councils to seek a range of products that will be accessible to a wider number of households if needs are to be met.

Given the high level of needs of older people, consideration may need to be given to where older people housing schemes are located and what the implications an increasing older population may have on the provision of health and social care services.

Q-H2-1: What is the best way to significantly increase the supply of affordable housing across South Warwickshire?

Q-H2-2: Please select the option which is most appropriate for South Warwickshire:

Option H2-2a: A single South Warwickshire wide affordable housing requirement

A single affordable housing requirement across the whole South Warwickshire area would provide a consistent approach across both Districts. This results in the most certainty – for developers, greater certainty in anticipating their costs; and for Councils, greater certainty in anticipating delivery of affordable homes. However, this approach would not reflect variations in value, or variations in affordable housing demand, in different areas of the Districts. This could result in a greater level of challenge on viability grounds in areas with lower house prices, and missed potential for affordable housing delivery in areas with higher house prices.

Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts

Separate affordable housing requirements for each District would go some way towards reflecting local requirements and local viability calculations. It would provide a reasonable level of certainty for developers and Councils. However, the District boundaries are unlikely to be the most accurate way of reflecting of variations in value, or variations in affordable housing demand, in different areas of South Warwickshire.

Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire

A more localised approach could reflect with greater accuracy the variations of value, or variations in affordable housing demand, in different areas of the Districts. This may mean fewer challenges on viability grounds. However, having different requirements in different localities adds a level of uncertainty – it makes it harder for developers to anticipate their costs, and it makes it harder for Councils to anticipate delivery of affordable homes. There could also be unintended consequences if it makes certain areas more attractive to developers than others, with the potential that this makes it more challenging to deliver the chosen spatial growth strategy.

Q-H2-3: How should South Warwickshire best address the specialist needs for older people?

Issue H3: Providing the right size of homes

Just as important as building the right type of homes, is ensuring that the right mix of homes is provided. Housing size also has an affordability aspect to it as smaller homes will cost less. However, it is important not to forget that many households in housing need will require larger properties.

The HEDNA recommends a range of sizes of homes across the three main housing tenures as shown in Table 12.

Importantly, the HEDNA notes that these figures are intended to be used as a monitoring tool rather than to be applied rigidly to all individual development sites. In applying the evidence, consideration should be given to the existing house mix in the locality and gaps within this; site location and characteristics; and local needs or market evidence (including from Council’s housing registers). Additionally, the HEDNA advises that the Councils should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market. Provision of specialist housing can assist in releasing existing family homes and supporting turnover in the wider housing market.

Table 12: Suggested housing size mix

	1-bedroom	2-bedroom	3-bedroom	4-bedroom
	Market Ownership			
Stratford-on-Avon District	10%	35%	40%	15%
Warwick District	10%	40%	40%	10%
	Affordable Home Ownership			
Stratford-on-Avon District	20%	45%	25%	10%
Warwick District	20%	45%	25%	10%
	Social / Affordable Rented			
Stratford-on-Avon District	40%	35%	20%	5%
Warwick District	40%	35%	20%	5%

(Source: Tables 15.6, 15.7 and 15.8, Coventry and Warwickshire HEDNA, Icen Consulting)

In addition to the number of bedrooms, the actual size of homes (i.e. internal housing space standards) is an issue which recurs through public engagement with a suggestion that minimum internal space standards should be applied through a local plan policy. The [Nationally Described Space Standard](#) set out by government (and schemes such as ‘Lifetime Homes’) are intended to create homes which are accessible and able to accommodate changing personal circumstances and

growing families. However, they have no statutory use on new developments requiring planning consent, unless they (or other standards based on locally derived evidence) are included in local policy.

In addition, it was agreed in response to a Notice of Motion to Council in Warwick District, that the principle of incorporating Nationally Described Space Standards within the SWLP would be considered through the plan making process (see Cabinet meeting for 29 September 2022, Item 09).

At this point in the plan process, we have not gathered evidence on the need for/benefits of locally derived space standards, though it has been raised as something to consider via different routes. This will need to be further considered against viability and deliverability of development.

The HEDNA identifies the number of homes estimated to be needed for wheelchair users and these requirements are set out in Table 13 for South Warwickshire.

Table 13: Estimated need for wheelchair user homes by 2032

	Market Housing	Affordable Housing
Stratford-on-Avon	11%	30%
Warwick	9%	24%

(Source: Table 14.24, Coventry and Warwickshire HEDNA, Icen Consulting)

Current policy context

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS19	110	New homes to contribute to balanced and sustainable communities by meeting identified local and district housing needs in terms of mix, size, tenure and type. Preferred type and mix for general needs housing set out. Specialist accommodation supported if meets a range of listed criteria Flexible design encouraged
Warwick District Local Plan	H4	72	Proposals required to include a mix of market housing that contributes towards a balance of house types and sizes across the district in accordance with latest SHMA. Range of defined circumstances to take into account
Warwick District Local Plan	H5	73	Permissions granted where a range of defined criteria are met
Warwick District Local Plan	H6	74	Permission only granted if a range of criteria are satisfied. Certain exceptions may apply

There is currently no policy within either the Stratford-on-Avon District Core Strategy, or the Warwick District Local Plan which specifies local minimum space standards across all new homes. Policy CS.9 of the Stratford-on-Avon Core Strategy does however make a reference to having ‘a good standard of space’, and CS.19 (B) sets out that 1 and 2 bed affordable homes should be built with bedrooms capable of satisfactorily accommodating two occupiers in each room.

We know South Warwickshire has a growing aging population. In recognition of this, and additional accessibility needs associated with an aging population, the plan may consider whether to incorporate optional accessibility standards within the current Building Regulations, as mandatory.

Q-H3: Please select all options which are appropriate for South Warwickshire

Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.

It may not be considered strategically important, across the entirety of South Warwickshire. In this case, minimum space standards could be considered in a Part 2 plan.

Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.

This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.

Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.

This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.

Option H3d: None of these

Issue H4: Accommodating housing needs arising from outside of South Warwickshire

National policy requires Local Plans to also provide for any needs that can't be met within neighbouring areas unless:

- The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- Any adverse effects of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.

Given the size of South Warwickshire it is considered that any additional needs can be accommodated outside of any protected areas (e.g. Cotswolds National Landscape/AONB). One exception *could* be areas designated as Green Belt but only if such locations were considered suitable, appropriate, and necessary as part of the wider development strategy. Find out more about our proposed approach to Green Belt locations in Section S5 of this document. Certainly, there is a strong argument that if homes

are being provided to meet needs arising in Coventry and Birmingham, then those homes should be located as close as possible to the source of those needs in order to minimise travel.

In respect of any adverse effects, once the scale of any contributions are known, the impacts of accommodating these additional homes and the suitability of any locations will be tested through the various accompanying technical studies that underpin this plan e.g. SA/SEA.

What you said:

- May require Green Belt release for development to come forward, concerns raised about this
- There are a great deal of brownfield sites which could be utilised for more housing
- The Councils need to fully engage in the duty to co-operate process to establish what percentage of the identified shortfall each Council should be responsible for.
- Locations for additional growth should be sustainable in close proximity to where people want to live.
- Housing needs that cannot be met within neighbouring areas must be met as close as possible to those areas, or within areas where sustainable transport connections can easily be made to those areas.
- Locating new development at train station could be one response to meeting the future housing needs of Birmingham in sustainable locations.
- Concerns on the scale of development on infrastructure, there will be a need for large scale strategic sites that can meet their infrastructure needs.
- Sensible and pragmatic approach should be taken to utilising existing infrastructure regardless of administrative boundaries
- Need to make sure that the policy is based on accurate evidence
- Some respondents consider that each area should meet its own government set targets

The existing Plans both address the requirement to provide for an element of meeting unmet housing need arising from outside of each of the Districts.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS16	90	Site Allocation Plan will identify Reserve Housing Sites to meet agreed housing requirement inc. that arising in C&W HMA and to need arising outside of C&W. Criteria for when Reserve Sites will be released.
Stratford-on-Avon District Core Strategy	CS17	100	Plan to be reviewed if evidence demonstrates significant housing needs arising outside of District that should be met within the District and cannot be met adequately without a review.
Warwick District Local Plan	DS2	15	The Council will provide in full for the objectively assessed housing need of the District and for unmet housing need arising from outside the district where this has been agreed.

A Housing Market Area (HMA) is geographical area where there are key relationships between the places where people live and work. HMAs are mapped nationally and are available at [Housing market areas - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/collections/housing-market-areas).

South Warwickshire sits most fully within the Coventry and Warwickshire HMA, with Warwick District most strongly related to Coventry given its shared boundary and interrelationships with the city. However, South Warwickshire is also within the Birmingham and Black Country HMA owing to Stratford-on-Avon District's shared boundaries and inter-relationships with Solihull and Redditch boroughs and Bromsgrove district. In respect of elsewhere, although not within any other HMAs, South Warwickshire does share boundaries with authorities in the Worcester, Cheltenham and Oxford HMAs.

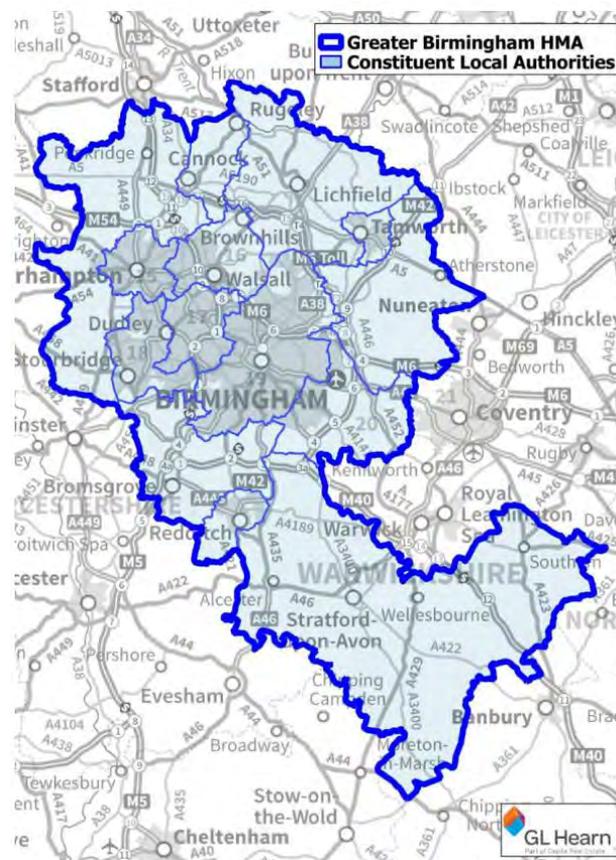
Through the Duty to Co-operate, South Warwickshire has a responsibility to help address unmet needs.

There are four elements to unmet needs that may have implications for South Warwickshire:

1. Shortfall from the Greater Birmingham and Black Country Housing Market Area (HMA) to 2031

The Greater Birmingham HMA comprises 14 local authorities covering the administrative areas of Birmingham, Bromsgrove, Cannock Chase, Lichfield, Redditch, Solihull, Tamworth, North Warwickshire, Stratford-on-Avon, the Black Country (Dudley, Sandwell, Walsall and Wolverhampton) and South Staffordshire.

Figure 23 – Greater Birmingham and Black Country Housing Market Area Geography



In respect of Birmingham, it is acknowledged that a housing shortfall of 37,900 was confirmed through the adoption of the Birmingham City Plan in February 2018. Officers from the 14 authorities have formed an officer group to co-ordinate work to resolve the issue of the housing shortfall, including co-ordinating the monitoring of housing delivery. The group jointly commissioned consultants to undertake a Strategic Growth Study to help to address the original shortfall. The authorities also published Position Statements in 2018 and 2020 setting out progress to remedying that shortfall. An updated position statement addendum has since been prepared as of December 2021. Information on this is available to view [here](#). This confirms the shortfall across the housing market area as now being 6,302 homes to 2031.

Whilst the position in relation to this unmet need between 2031 and 2050 for South Warwickshire is still under consideration, for the period up to 2031 the emerging Stratford-on-Avon Site Allocations Plan makes a number of Reserve Site allocations to meet the needs of the Greater Birmingham and Black Country HMA up to 2031.

Policy SAP.4 of the [Stratford-on-Avon Site Allocation Plan Revised Preferred Options \(June 2022\)](#) identifies a number of sites with a total capacity of approximately 380 homes that, subject to the provision of SAP.5 (Applications for Reserve Housing Sites), will be released to provide Stratford-on-Avon District's contribution to meeting the shortfall in dwelling provision in the Greater Birmingham & Black Country HMA:

- STR.A – North of Evesham Road, Stratford-upon-Avon
- STR.B – East of Shipston Road, Stratford-upon-Avon
- STR.C – South of Alcester Road, Stratford-upon-Avon
- MAPP.A – West of Birmingham Road, Mappleborough Green

The following additional sites totalling 150 homes will also be released if specific infrastructure constraints can be overcome by 2031:

- STR.D – East of Banbury Road, Stratford-upon-Avon

2. Shortfall from the Greater Birmingham and Black Country Housing Market Area (HMA) to 2050

In addition to the shortfalls identified for the period to 2031, Birmingham City Council has also commenced work on its Local Plan Review to 2042 and has published an [Issues and Options consultation](#). This identifies a shortfall in housing of 78,415 homes. Additional shortfalls may also be identified arising from the Black Country authorities.

In addressing any shortfall, the two Councils will need to work closely with the other councils within the housing market area. Consideration may also need to be given to the strength of the relationship between the South Warwickshire and the source of these shortfalls. These shortfalls exist because the areas from which they originate are constrained by the West Midlands Green Belt. The consequence of the Green Belt is that if needs cannot be met within the urban areas, then provision must be made in those rural areas beyond the Green Belt, such as South Warwickshire.

For the purposes of the accompanying Sustainability Appraisal we have tested the effects of an additional 5,000 and 10,000 homes.

3. Shortfall from Coventry to 2050

Issue H1 above sets out the approach to needs arising within Coventry and Warwickshire. Even under the redistribution of housing resulting from the trend-based projection, Coventry may not be able to accommodate all of its housing needs (1,964 homes per annum), and as such a relatively modest shortfall may exist to 2050 which South Warwickshire will need to do its part in addressing. We will firstly work with colleagues from Coventry to identify how much housing it can accommodate and secondly, with the other councils across Warwickshire to agree how the shortfall is best accommodated.

4. Shortfall from other HMA areas to 2050

South Warwickshire is adjoined by a number of other HMAs, however the linkages are relatively weak. The Councils liaise with relevant neighbouring authorities and to date none has sought to request that either Council contributes to meeting their housing needs. It is therefore not anticipated that South Warwickshire will be required to meet any housing needs arising from any other HMAs up to 2050.

Q-H4-1: Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District?

Y/N/DK

Q-H4-2: Do you have any comments about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan?

Y/N/DK

Q-H4-3: If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?

You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question

Issue H5: Providing custom and self-build housing plots

Self and Custom-built homes range from those that people build themselves to homes which individuals commission, making key design and layout decisions, but the home is built ready for occupation. This type of housing can help to diversify the local housing market and increase choice.

Current adopted and emerging approach

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS15	83	Does not contain a specific policy on self and custom build housing as it was at an advanced stage of preparation in 2016 when the Government introduced new requirements for this type of housing. However, the requirement for self and custom-built homes is identified in the Strategy as an integral part of the housing mix in the new settlements at Gaydon/Lighthorne Heath and Long Marston Airfield.
Stratford-on-Avon District Site Allocation Plan Revised Preferred Options (June 2022)	Policies SAP6 and SAP7.	50	Sets out an approach to providing and delivering self and custom build sites. It also identifies 12 sites for the specific purpose of self and custom build homes and provides a criteria-based approach for unallocated sites and individual plots.
Warwick District Local Plan	H15	81	Encourages the provision of self and custom build housing in suitable, sustainable locations, subject to other policy requirements.

We need to increase the availability of land for this type of housing in order to meet the demand within South Warwickshire. There are a number of ways we can increase the availability of plots to meet demand; the best solution may be a combination of options.

Q-H5: Please select all options which are appropriate for South Warwickshire

Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.

This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not be appropriate.

Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.

This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. However, some people looking for self and custom build homes may not wish to live or on the edge of a large housing site. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.

Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.

This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for self and custom build homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of self and custom build home are made available.

Issue H6: Pitches and Plots for gypsies, travellers and travelling showpeople

Developing sustainable communities that are strong, vibrant and healthy, and which meet the needs of all sectors of the community, including Gypsies and Travellers and Travelling Showpeople, is an important requirement for this Plan. The lack of suitable permanent sites can lead to unauthorised encampments and is difficult to control and manage. Having a Local Plan that sets out how the need will be met provides certainty to communities as to where this type of development will take place rather than having to react to speculative applications or appeals.

There are not enough sites across South Warwickshire for this type of accommodation and so we need to plan for more, up to date evidence is currently being prepared to identify what the need is for pitches and plots across South Warwickshire up to 2050. This may include a combination of both permanent and transit pitches and sites.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS21	118	Sets out a criteria-based approach for assessing proposals for new pitches, plots and sites. This includes the identification of two preferred broad location for new provision. The Core Strategy set out the intention to produce a specific Gypsy and Traveller and Travelling Showpeople Plan to identify specific new sites, however due to the lack of available sites it has not been possible to progress this Plan.
Warwick District Local Plan	H7	76	Sets out the intention to produce a Gypsy and Traveller Plan to allocate sufficient land on sustainable sites to meet the need within the District, however due to the lack of available sites it has not been possible to progress this Plan.
Warwick District Local Plan	H8	77	Includes a set of criteria to assess proposals for new sites and Policy H9 sets out that the Council may use Compulsory Purchase Powers as a last resort to acquire sites if all other options have been exhausted.

There are a number of ways we can increase the availability of Gypsy and Traveller and Travelling Showpeople accommodation to meet the need; the best solution may be a combination of options.

Q-H6: Please select all options which are appropriate for South Warwickshire

Option H6a: Identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople homes.

This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not likely be appropriate.

Option H6b: Require large developments of over 500 homes to provide a proportion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site.

This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. Whilst this option has the potential to build positive relationships between the settled and travelling communities and enable both communities to benefit from sustainable infrastructure that is provided as part of a large development, measures would likely need to be put in place to manage and foster these relationships. This approach may not be suitable for Travelling Showpeople yards which are typically larger in order to accommodate circus and fairground equipment. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.

Option H6c: Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Showpeople homes will be assessed against a range of criteria to determine their suitability.

This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for Gypsy and Traveller and Travelling Showpeople homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of these type of homes are made available; in the past this approach by itself has not delivered sufficient new provision to meet the need.

Q-H7: Please add any comments you wish to make about delivering homes in South Warwickshire

7: A climate resilient and Net Zero Carbon South Warwickshire

The Government’s target is to reach net zero by 2050, and its 2021 Net Zero strategy highlights the important of the planning system in combatting climate change and supporting sustainable growth.

The Plan has a legal duty and decisive role in tackling climate change across South Warwickshire through helping to shape places that reduce carbon emissions and adapt to the expected changes that climate change will bring thereby improving resilience.

Both Councils declared a climate emergency in 2019 and have subsequently produced a [Climate Change Action Programme](#) which sets out the actions we must take to deliver on our climate change ambitions including from the business, housing and transport sectors. The Local Plan is one of the ways we can facilitate the delivery of the identified actions.

What you said:

- Significant number of respondents suggest that the Plan should give more priority and urgency to the need to address climate change
- Approach needs to be workable, deliverable and follow a flexible approach
- Most respondents agreed with the measure proposed within the Scoping Consultation
- A range of further suggestions were put forward including:
 - Net Zero Carbon building standards
 - Location of new development
 - Creating good quality transport links that promote active travel and encourage the use of public transport
 - Green and Blue Infrastructure
 - Improving water resource efficiency
 - Retrofitting buildings and streets
 - Improving air quality
 - Committing to a biodiversity net gain
 - A strategy for a green economy
 - Flood mitigation
 - Generation of renewable energy
 - Green education and training

To inform the approach taken to drive forward the change that new development must embrace, an assessment of the causes, effects and potential future impacts of climate change is essential.

Providing a clear picture of the current state of play is a critical part of understanding the starting point, defining future targets, and setting the trajectory to get there. A [Climate Change Baseline Report](#) has been independently produced to support the Issues and Options consultation which sets the baseline and identifies opportunities to embed climate change considerations into the local planning process based on the following six themes:

- Housing Growth
- New Buildings, Design and Retrofit

- Economy
- Environment
- Infrastructure and Utilities

To mitigate climate change in South Warwickshire there are three key findings from the data:

- **Road transport** is the most significant source of emissions across South Warwickshire, representing higher than average per capita emissions compared with the UK as a whole
- **Buildings** – especially **residential buildings** – are also a major source of emissions for the area, pointing to the need both to reduce emissions through building retrofits and to avoid emissions through the planning and design of new buildings
- There is a significant opportunity to enhance carbon sequestration through protection, restoration and appropriate management of **green land uses**.

7.1 Large scale renewable energy generation and battery storage

A key element in achieving net zero is moving away from fossil fuels in electricity generation. While national schemes are likely to provide the bulk of our electricity, Local Authorities also have a role to play in enabling renewable energy generation schemes to go ahead. For example, national policy states that onshore wind projects can only be approved if they are in areas identified as suitable in a Local Plan, that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

In order to increase the use and supply of renewable and low carbon energy and heat, national policy requires plans to provide a positive approach that maximises the potential for suitable development whilst ensuring that adverse impacts are satisfactorily addressed. This would include renewable, such as solar, wind, hydrogen, and low carbon energy sources and supporting associated infrastructure such as battery storage. Where feasible dual uses can maximise the benefits from a site, for example incorporating both a solar farm and land cultivation/biodiversity opportunities.

Issue C1: Solar and wind power

What you said:

Locations identified for renewable energy need to be appropriate and should consider the impact on the landscape and the loss of good quality agricultural land, and should only be allowed where mitigation can be provided.

Better to list or map specific locations for renewable energy generation rather than react to individual planning applications on an ad-hoc basis.

Different areas of South Warwickshire may be more suited to solar and wind generation than others. As well as the amount of sunlight and wind experienced in a location, a careful balance is required that considers factors including the impact on the landscape and heritage assets, the loss of agricultural land, the sterilisation of mineral reserves, and community support.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.3	30	In principle support of renewable energy schemes, including solar and wind, subject to conditions. Land is not allocated.
Warwick District Local Plan	CC2	104	In principle support of renewable energy schemes, including solar and wind, subject to conditions. Land is not allocated.

Q-C1.1: Please select the option which is most appropriate for South Warwickshire

Option C1.1a: Identify and allocate land that is considered suitable for wind or solar energy generation schemes

Allocating suitable land would set the groundwork for future renewable energy proposals. The details of any such proposal would be further assessed through planning applications. Allocating land would also help prevent schemes coming forward in less suitable locations.

Option C1.1b: Do not allocate land, but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location.

Choosing not to allocate land for renewable energy generation would in effect rule out onshore wind projects, unless land was allocated for this purpose in a Neighbourhood Development Plan. Solar developments are not bound by the same restrictions as onshore wind, so these could still come forward without land having been allocated. This type of policy would show general support but would not identify specific locations. Proposals would therefore be considered on a site-by-site basis at planning application stage rather than a more planned-for approach. The policy could encourage this use on certain grades of agricultural land.

Option C1.1c: None of these

The criteria against which schemes would be considered are likely to be broadly in line with existing policies CS.3 and CC2, for example considering the impact on:

- Agricultural land
- Landscape and visual amenity
- Ecology and biodiversity
- Light and glare, particularly with reference to aviation and biodiversity
- Historic assets
- Traffic generation
- Potential sterilisation of minerals reserves
- Community impacts

Q-C1.2: Are there any other criteria which should be considered when assessing proposals for large scale renewable energy developments?

Allocating land for other renewable energy or related uses is not presented as an option here. In contrast to solar and wind farms, the land area needed for a battery storage or hydrogen production facility is relatively small; allocation is not necessary for these schemes to come forward; and as emerging technologies it is difficult to predict industry requirements in the coming years.

The current [Call for Sites exercise](#) invites submissions of available land, including land which might be appropriate for wind or solar energy development. Knowing what land is available will help us to undertake a fully informed exploration of the potential for renewable energy allocations. It is not intended to pre-judge which of the above policy options might be most suitable for South Warwickshire.

Issue C2: Decentralised energy systems

Decentralised energy systems supply heat and / or power to specific residential and commercial developments or localities. This may be by capture of waste heat from other processes or generated on site. Decentralised energy systems can be the most efficient way to provide energy, heating and cooling to dwellings where a development is of sufficient size, use mix and density to make such a scheme viable. This may be in the form of District Heating (heat only), Combined Heat and Power, or Micro-grid (power only). These systems can be provided in different ways including through community energy schemes.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.3	30	New developments in district heating priority areas are required to incorporate infrastructure for district heating, and to connect to existing systems where and when this is available, unless unviable. Developments in other areas are encouraged to incorporate district heating infrastructure.
Warwick District Local Plan	CC.3	105	Applicants to consider the potential to incorporate decentralised district heating networks on the strategic sites identified in the Plan.

Q-C2: Please select the option which is most appropriate for South Warwickshire

Option C2a: Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable

Decentralised energy schemes are typically only viable for developments of a significant size – for example in the region of 2,500 or more dwellings, or 10 hectares or more of employment land. In order see a benefit from this option, much of the planned growth would need to be concentrated into a smaller number of larger developments.

Option C2b: Have a policy encouraging the consideration of decentralised energy systems

Option 2 allows for greater flexibility, but is a weaker policy that may result in opportunities being missed.

Option C2c: None of these

Issue C3: Carbon Sequestration

Carbon sequestration is the long-term storage of carbon in plants, soils, geological formations and the ocean, and has the potential to make a significant contribution to the removal of carbon dioxide from the atmosphere. The Plan provides an opportunity to enhance carbon sequestration through the protection, restoration and appropriate management of green land uses.

Restoration and management activities can include afforestation (conversion of non-forested land to forest), reforestation (conversion of previously forested land to forest), improved forestry or agricultural practices, and revegetation. Encouraging the shift from pasture to arable land enables a reduction in livestock emissions whilst freeing up land for arable agriculture and woodland which have sequestration benefits.

Environmental net gain can be an effective way to assist in offsetting the unavoidable impacts of new development. Such an approach could incorporate carbon emission offsetting. Some developments may not be able to completely neutralise their carbon emissions and in these cases a carbon offsetting approach could be developed whereby a contribution would be paid by the developer. These contributions could then be used to reduce carbon emissions elsewhere, for example through the retrofitting of the existing housing stock. More detailed consideration of environmental net gain and carbon offsetting is set out within [Issue B5: Environmental Net Gain](#).

Q-C3.1: Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site? Y/N/DK

Q-C3.2: Do you have any proposals for projects/schemes within South Warwickshire in which developer (or local business) offset payments could be invested to secure emissions removals or reductions?

Q-C3.3: Please add any comments you wish to make about renewable energy generation or carbon sequestration in South Warwickshire

7.2 Net Zero Carbon buildings

What you said:

- Some respondents felt that applying the energy hierarchy might set a negative precedent for moving forward, and that a fabric first approach should be applied in the first instance rather than relying on energy saving technology or renewable energy generation
- Some concerns raised about viability and that policies applying the energy hierarchy must be proportionate to the scale of development, justified and not overly prescriptive.
- The approach should include some level of flexibility to make sure it doesn't make schemes unviable
- Some respondents consider that the Councils should rely on building regulation standards and not go further than that, in that it will create uniformity, and that it is not appropriate for Councils to set additional local energy efficiency standards through planning policy.
- The use of the energy hierarchy aligns with national targets as the move to Net Carbon continues.

The Planning and Energy Act 2008 gives local planning authorities the ability to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the Part L Building Regulations.

In 2021 the government published the outcome of the Future Homes Standard consultation, outlining what changes will be made to Building Regulations for new dwellings, and at what pace. With effect from June 2022, changes to Building Regulations mean that all new homes must produce 30% less carbon dioxide emissions than previous standards. From 2025 all new homes will be required to produce 75-80% less carbon dioxide emissions and will need to be 'zero-carbon ready' requiring no further energy efficiency retrofit work to enable homes to become zero-carbon as the electricity grid decarbonises. The Future Building Standard builds on this by setting out energy and ventilation standards for non-domestic buildings and existing homes, providing a pathway to zero carbon ready non-domestic buildings.

In 2021 the government also published its Net Zero Strategy: Build Back Greener which outlines how the UK will manage its carbon budgets and sets out how the UK's vision for a net zero economy by 2050, and measures to transition to cleaner energy and reduce the UK's reliance on imported fossil fuels. The strategy includes decarbonisation pathways and proposals to reduce sector-specific emissions to support the transition to net zero. There is a recognition that local authorities play an essential role to influence key sectors in the transition to net zero.

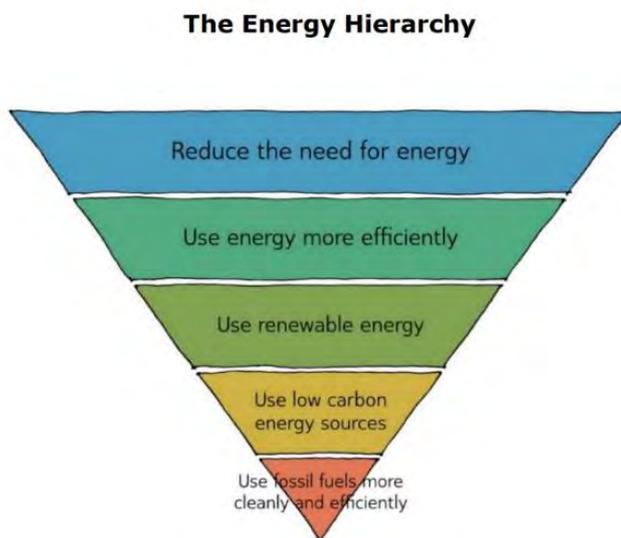
The [Climate Change Action Programme \(2021\)](#) for both South Warwickshire Councils sets out a number of ambitions, of which Ambition 2 (Low Carbon South Warwickshire 2030) aims to reduce net carbon emissions from across South Warwickshire by a minimum of 55% by 2030 and alongside this, plan how to further reduce carbon emissions to net zero by 2050.

Well-designed schemes should be considered at the beginning of any planning process, and the building and retrofit of low and zero carbon homes will require the Energy Hierarchy to be taken into account from the outset. [The National Design Code 2019](#) identifies the need for new developments to follow the energy hierarchy to:

1. Reduce the need for energy through passive measures, including form, orientation and fabric

2. Use energy efficient mechanical and electrical systems, including heat pumps, heat recovery and LED lights; and
3. Maximise renewable energy especially through decentralised sources, including on-site generation and community-led initiatives

Figure 24 - The Energy Hierarchy



Current adopted and emerging policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.2	26	Encourages high sustainability standards in buildings and promotes the application of the energy hierarchy. Non-residential development is expected to comply with the BREEAM ‘good’ standard and extensions/reuse of buildings are expected to improve overall energy performance.
Warwick District Local Plan	CC1	102	Requires development to be designed to be resilient to, and adapt to the future impacts of climate change through the inclusion of a range of appropriate measures.
Warwick District Local Plan	CC3	105	Requires non-residential development over 1,000 sq.m to achieve a ‘very good’ BREEAM standard.
The Warwick District Council Net Zero Carbon Development Plan Document (DPD) Consultation Draft (April 2022)	Policies NZC1-4.	Various	Aims to minimise carbon emissions from new buildings within the District to support the achievement of national and local carbon reduction targets

Issue C4: New Buildings

Buildings are a major source of emissions for South Warwickshire and so the need to minimise those that are generated from new development is critical in achieving the climate emergency ambitions.

Q-C4.1: Please select all options which are appropriate for South Warwickshire

Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time.

Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.

Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments.

This would require all new development to achieve net zero carbon from adoption of the plan, expected in 2025. However, it would be at a cost as the development industry may not be ready to viably deliver this and as a consequence we may see less affordable housing built and maybe fewer other social and community benefit from development to offset the cost of achieving net zero carbon. Viability work would be needed to establish the impact of this approach.

Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards.

This would require all new development to achieve net zero carbon from a future date and this would be set out in the plan. It could allow time for the development industry to adjust to the higher standards, give time for the cost of achieving these standards to come down, and may mean that we can secure more affordable housing and community benefits from development. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan.

Q-C4.2: What scale of development should the requirements apply to?

Option C4.2a: All new development

Including for example residential extensions

Option C4.2b: Development over a certain size

For example all developments of 1 dwelling or more, or 100+ square metres

Issue C5: Existing Buildings

The existing building stock will continue to form the vast bulk of buildings within South Warwickshire, even by 2050. As such, most of the climate impacts relating to buildings will come from those already built. Opportunities for retrofitting come through proposals for conversions, changes of use and residential householder applications. It can also come about by the addition of measures, such as solar panels and heat pumps, to existing buildings.

The type, location and scale of the measure(s) will determine whether or not planning permission will be required. Some measures may be capable of being installed without needing planning permission.

In relation to historic buildings, [Historic England](#) highlights that sympathetically upgrading and reusing existing buildings, rather than demolishing and building new, could dramatically improve a building's energy efficiency and would make substantial energy savings because the emissions already embodied within existing buildings would not be lost through demolition. They advise that locally-specific policies about retrofit are essential for achieving this objective.

Q-C5a: Please select all options which are appropriate for South Warwickshire

Option C5a: Include a policy that requires net zero carbon requirements for all building proposals that require planning permission – including conversions, changes of use, and householder residential applications

Achieving net zero carbon requirements on existing buildings that are converted or change use is a great way to be able to retrofit climate change adaptation and mitigation measures into South Warwickshire's existing building stock. However, the ability to make changes to existing buildings can be more restrictive and expensive than on new builds and may result in some developments becoming unviable.

Option C5b: Include a policy that encourages the retrofit of climate change measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas

A policy that proactively encourages the retrofitting of climate change measures into existing buildings, within certain parameters, can make it easier and provide more certainty for property owners to be able to tackle climate change. In sensitive locations this approach may be more challenging and if taken forward it will be important for solutions to be sought to minimise any adverse impact on local surroundings.

Option C5c: None of these

Issue C6: Whole Life-Cycle carbon emission assessments

Whole Life-Cycle Carbon emissions are those resulting from the material, construction and the use of a building over its entire life, including its demolition and disposal. A Whole Life-Cycle Carbon Assessment considers a building's carbon impact on the environment and are most usefully undertaken once a building has been constructed but prior to occupation. In order to drive down emissions a policy approach would be necessary to establish appropriate targets to reduce emissions.

Q-C6.1: Please select the option which is most appropriate for South Warwickshire

Option C6.1a: Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a 'business-as-usual' approach to construction

A policy requiring reductions in embodied emissions of 100% would have a significantly positive effect on reducing carbon emissions from new development. There are challenges that would need to be overcome in terms of validating and assessing emissions data to ensure its robustness. There may be implications for the viability of some developments following such a policy and this would need to be tested.

Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods.

A phased and more flexible approach to embodied carbon emissions would slow down the rate at which South Warwickshire can drive down its carbon emissions and could be more complicated to administer if different types of developments have different requirements. However, the approach would allow more time for the development industry to take account and adapt to these requirements and ensure that development are fully viable so that they can come forward to meet the area's development needs.

Option C6.1c: None of these

Q-C6.2: If a phased approach is used, what dates and thresholds should be used?

For example, achieve 80% reduction by 2030 and 100% reduction by 2040.

Q-C6.3: Please add any comments you wish to make about Net Zero Carbon buildings in South Warwickshire

7.3 Climate responsive development design

Climate change is anticipated to increase average annual temperatures and the occurrence of extreme temperature events, and increase the occurrence of extreme weather events including both flooding and drought events. In addition, it is predicted to have negative impacts on biodiversity and wildlife habitats thereby affecting oxygen production, carbon storage and the natural filtering of toxins. Ensuring that new development and changes to existing buildings respond to these changes is therefore a crucial element in responding to the climate emergency and will create more resilient communities for the future.

At the same time new development should acknowledge the imperative to minimise consumption-based emissions, building in identifiable initiatives to influence sustainable lifestyle choices and behaviours. This includes locally grown food, active travel and electric vehicle charging points.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford Core Strategy	CS.4	36	Sustainable drainage systems (SuDs) to be proportionately included in all scales of development. All development proposals to control and discharge 100% of runoff into SuDs. Presumption against the underground storage of water.
		36-41	No specific policy requirements on water consumption, though there is reference to minimising water consumption.
Warwick District Local Plan	CC3	105	Non-residential development over 1000 sq.m to achieve BREEAM very good standard. Applicants to consider potential to incorporate large scale decentralised district heating networks.
Warwick District Local Plan	FW2	108	All developments to include sustainable drainage, with a presumption against water storage underground.
Warwick District Local Plan	FW3	109	The Council will require all new residential development of one dwelling or more to meet a water efficiency standard of 110litres /person/ day. This includes 5 litres/ person/ day for external usage.

Issue C7: Adapting to higher temperatures

Future-proofing new development to adapt to the effects of higher and more extreme temperature change can be achieved through a range of design features including:

- Use of shade and ventilation applying a cooling hierarchy to ensure that developments are cooled in the most sustainable and energy efficient manner possible.

Table 14 – The Cooling Hierarchy

1.	Passive design – using energy efficient design to reduce the amount of heat entering the building in the warmer months. This can be achieved through appropriate orientation, overhangs and shading, albedo, fenestration, insulation and green roofs. Heat can also be reduced within the building through high ceilings and exposed internal mass; however, provision must be made for night purging of heat through secure ventilation. Such ventilation should be closable to preserve air tightness in cold weather.
2.	Passive / natural cooling – using outside air to ventilate and cool a building without using a powered system.
3.	Mixed mode cooling – using a mixture of both passive cooling methods and: <ol style="list-style-type: none"> a. Mechanical cooling, such as fan powered ventilation (preferred option) b. Air conditioning (not preferred option due to being energy intensive).
4.	Full building mechanical ventilation / cooling system using the lowest carbon / energy options – only to be considered after all other elements of the hierarchy have been considered.

- Use of cool materials, for example roofs and paving, which are light in colour or have solar reflective properties and can significantly reduce the solar heat gain thus reducing the need for artificial cooling in summer. Cool pavements and hardstanding can be achieved by using permeable surfaces and light-coloured materials. Permeable surfaces can cool local temperatures through the process of evapotranspiration, whilst light materials are more solar reflective and therefore absorb less heat.
- Green Infrastructure through the use of green roofs and walls on buildings and green and blue corridors within developments can provide multiple benefits including providing a natural cooling effect and enhancing biodiversity. The use of trees and landscaping can also cool temperatures and provide shading and can provide benefits in streets, pedestrian and cycle routes, public open space and car parks.

Q-C7: Please select the option which is most appropriate for South Warwickshire

Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures?

This would include the application of the cooling hierarchy, the use of cool materials and provision of green infrastructure to create cooling.

Option C7b: Do not include a policy that requires new developments and changes to existing buildings to incorporate measure to adapt to higher temperatures

Not having a policy requiring developments to adapt to higher temperatures would result in new building stock not being designed to deal with this effect of climate change.

Option C7c: None of these

Issue C8: Adapting to flood and drought events

Designing new development to sufficiently manage the use and storage of water is critical in mitigating the effects of climate change, there are a number of ways this can be achieved including:

- Sustainable Urban Drainage Systems (SuDS). To manage risk of surface water flooding, sustainable drainage schemes are commonly required or at least encouraged within new developments. In addition to flood risk reduction and potential resultant improvements to the quality of the water environment, they have added potential benefits in terms of habitat creation and biodiversity. There are many different types of SuDS suitable for all scales and types of developments and they can be incorporated into new developments and contribute towards creating a strong sense of place. New SuDS should follow the Drainage Hierarchy as set out within the NPPF. In addition, permeable surfaces for hardstanding, driveways and paved areas allow for enhanced drainage of surface water
- Reducing water consumption. Climate change and population growth are increasing pressure on our water resources and [South Warwickshire is an area of serious water stress](#). There is a need to reduce our demand for water and supporting water efficiency through rainwater harvesting and greywater recycling reduces the amount of water required from the mains supply and the amount entering drains. This can be achieved through both building and development wide schemes.
Policy options in relation to reducing water consumption include specifying a water efficiency target above Building Regulation requirements for new residential developments. The existing Warwick District Local Plan sets a requirement of 110 litres per person per day which could be carried forward into the new South Warwickshire Local Plan, however consideration could be given to going beyond this standard to 100 litres per person per day or even lower.

Q-C8: Please select the option which is most appropriate for South Warwickshire

Option C8a: Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events

This would include SuDS and water efficiency requirements

Option C8b: Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events

Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.

Option C7c: None of these

Issue C9: Mitigating Biodiversity loss

Incorporating high levels of green infrastructure, including street trees, into built-up areas can bring people closer to nature, restore biodiversity, aid carbon sequestration, enable the movement of wildlife, soak up pollutants and reduce flood risk. The [Environment Agency Report 'Working with Nature' \(July 2022\)](#) highlights a range of nature-based solutions. Some of the types of measures that can be applied include:

- Bio-enhancing developments both within green spaces and throughout the design as part of background wildlife capacity through the provision of wildlife friendly and biodiverse planting and landscaping, features such as hedgerows, trees, bird/bat boxes, hedgehog holes and homes, appropriate external lighting. In major developments it may be appropriate to require less than 50% of the wider site (excluding buildings) to consist of paved/hardsurfaced areas.
- Local wildlife nodes and blue and green corridors can link developments to the surrounding biodiversity network, enabling the bridging of habitats where they have been separated by human development. The creation of local wildlife nodes, utilising underused land such as verges at junctions and street corners provide an opportunity to increase biodiversity.

Q-C9.1: Please select the option which is most appropriate for South Warwickshire

Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity

This could include a requirement for larger developments to have less than 50% of the wider site (excluding buildings) to consist of paved/hard surfaced areas.

Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity

Opportunities for biodiversity enhancement may be lost without a policy in the plan requiring biodiversity measures to be incorporated into development.

Option C9.1c: None of these

Q-C9.2 Please add any comments you wish to make about climate responsive development design in South Warwickshire

Issue C10: Climate Change Risk Assessments

The modelling of future climatic impacts for a site to determine how it is likely to be affected by climate change helps to understand the issues and inform how best it can be planned and designed for resilience. Climate change risk assessments can be a useful way in which to identify the climatic factors likely to affect a particular development and the measures that can be incorporated to mitigate and adapt to these effects. As a baseline for such assessment, Representative Concentration Pathways (RCPs) (as described by the Intergovernmental Panel on Climate Change) represent different plausible trajectories for the climate, depending on the concentration of greenhouse gas emissions. There are a range of RCP scenarios depending upon different assumptions up to RCP 8.5 which is based upon a worst case scenario. Further information on RCPs is available [here](#).

Q-C10.1: Please select all options which are appropriate for South Warwickshire

Option C10.1a: Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment. This could this be in line with RCP 8.5 in order to maximise the level of interventions incorporated?

RCP 8.5 is a 'business-as-usual' scenario in which emissions continue to rise throughout the 21st century and climate change continues unabated. This scenario is suggested as a baseline as if new developments assess risks related to this scenario a more comprehensive approach to incorporating adaptation and resilience interventions can be achieved than applying a lower RCP scenario.

Option C10.1b: Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated?

Once an assessment has been undertaken, checklists are a useful way in enabling developers to identify which interventions they will incorporate into a new proposal. [Stratford-on-Avon District Council's Development Requirements SPD Part V on Climate Change Adaptation and Mitigation](#) is a way in which checklists can be applied in this way. Alternatively, there may be other tools or guidance that could be developed.

Option C10.1c: None of these

Q-C10.2 Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire

7.4 Flooding and water management

Issue C11: Water Management

Whilst water supply is clearly a key issue for growth, dialogue with stakeholders placed greatest emphasis on water efficiency measures rather than supply infrastructure (which is a statutory obligation). Policy FW4 in the Warwick District Local Plan emphasises need to minimise the need for new infrastructure, though for the purposes of the Part 1 plan this will be considered through the spatial strategy.

Both the Stratford-on-Avon Core Strategy and the Warwick District Local Plan include policy pertaining to water quality. These focus on protecting the status of water bodies in line with the Water Framework Directive's objectives, from the impacts of surface and ground water pollution and waste water treatment discharges. It is acknowledged that there have been recent issues with sewage leaks in some locations across South Warwickshire, which emerging policy may also seek to tackle. Further evidence on the issue of water quality is anticipated in a Water Cycle Study.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.4	38	Water bodies must maintain 'good' status in River Severn, Humber and Thames Basin Management Plans. Developments which would have a negative impact on water quality either directly or indirectly should be resisted.
Warwick District Local Plan	FW4	110	Protect and maintain 'good' status of waterbodies in River Severn Basin Management Plan.

Q-C11: Please select the option which is most appropriate for South Warwickshire

Option C11a: Do not include a policy on water quality in the SWLP Part 1

'Save' existing policy content in this regard from existing plans and take forward through subsequent policy documents as appropriate. The spatial strategy should take account of the impact of strategic growth on relevant watercourses.

Option C11b: Include policy along similar lines to the existing policies, where supported by up-to-date evidence

Prioritise water quality as a strategic issue, and develop a new policy based upon up-to date evidence.

Option C11c: None of these

Environmental net gain can be an effective way to assist in offsetting the unavoidable impacts of new development. Such an approach could incorporate water quality offsetting. Some developments may not be able to completely achieve water quality requirements and in these cases an offsetting approach could be developed whereby a contribution would be paid by the developer. These contributions could then be used to improve water quality elsewhere. More detailed consideration of environmental net gain and water quality is set out within [Issue B5: Environmental Net Gain](#).

Issue C12: Flood risk

There are 31 main rivers within South Warwickshire, and as such parts of the area are at risk of flooding. Whilst the NPPF sets out a clear national approach to flood risk, both SDC and WDC have existing policies which seek to consider the issue at a local level. Such local policies are required by paragraph 156 of the NPPF, which compels local plans to address flood risk from all sources, taking account of predicted impacts of climate change.

[A Strategic Flood Risk Assessment \(Part 1\)](#) has been undertaken by external consultants, and a SFRA (Part 2) and Water Cycle Study will follow. The SFRA (Part 1) examines the flood risk from different sources across South Warwickshire, including taking account of the impacts of climate change. Part 2 at a later date will examine flood risks in specific locations based on a preferred spatial strategy as it emerges. These pieces of evidence, once complete, will further inform emerging policies to address flood risk from all sources, plus spatial strategy options. This will include consideration of predicted climate impacts on these flood risks.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.4	36	Flood zone 1 (low risk) preferred. Sequential test (and exception test where appropriate) required for sites in flood zones 2 and 3. Maintenance of functional floodplain, and where possible restoration.
Warwick District Local Plan	FW1	106	See FW1 Presumption against development in flood zone 3. Must meet sequential and exception tests where required. Requirements a-e.

The scope of this policy is yet to be determined. However, flood risk is considered a strategic planning matter in terms of developing the spatial strategy and policy. It will therefore be included in the Part 1 plan.

Q-C12: Please add any comments you wish to make about water management or flood risk in South Warwickshire

8: A well-designed and beautiful South Warwickshire

What you said:

- Broaden design principles identified in the Scoping Document and ensure they have a role in both determining the locations of growth and the design of the growth itself
- Create a predictable approach to design quality and standards in the application of the plan policies
- Recognise and draw out the benefits of mixed use
- Place greater emphasis on place and character
- Ensure design is complimentary with the agenda of tackling climate change, and with economic factors (albeit views on the later were mixed)

Design is an overarching concept which interacts directly or indirectly with all other aspects of the plan. It is about how a place functions and feels at all scales, encompassing the 6 high level principles in paragraph 130 of the NPPF. The NPPF places renewed emphasis on creating ‘well designed places’, stating that “good design is a key aspect of sustainable development” (para 126). It includes a section (paragraphs 126-136) dedicated to setting out how to achieve this, supported by the National Design Guide and the National Model Design Code.

This section will consider principles for strategic design policy, protecting and enhancing heritage assets, and policy mechanisms/vehicles which could be identified/referenced within the SWLP to achieve the best design outcomes at all scales. It should be considered in conjunction with the principle of 20-minute neighbourhoods and other connectivity matters; which are key to design integration; set out under the theme ‘[A Well Connected South Warwickshire](#)’.

Paragraph 127 of the NPPF sets out that plans should identify a clear design vision and expectations at the most appropriate scale. These, it goes on, should be produced in collaboration with local communities, and build upon understanding and evaluation of the area’s local characteristics.

Given the strategic nature of the Part 1 SWLP, it will be important to set out appropriate strategic design policies, whilst also identifying vehicles to determine finer grain policy tailored in detail to specific locations. This finer grain policy may be within specific design guides, developed in consultation with the local community, or through Neighbourhood Development Plans (NDPs) developed by the local community itself.

Strategic design policies aim to form the foundations on which to build future detail, and ensure that growth is located and designed to create places for all residents in future. Aspects of child-friendly environments are being considered in the development of policy, as environments that are friendly to children are also generally more hospitable to many other sectors of society. In addition, climate adaptation is likely to link through these policies.

Issue D1: Strategic design principles

In considering the scope of potential strategic principles for inclusion in the SWLP, particular regard has been given to paragraph 130 of the NPPF, policy CS.9 of the Stratford on Avon Core Strategy, and policies BE1 and BE2 of the Warwick District Local Plan. Recurring themes in these policies are reflected in option 1 below.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.9	63	Attractive, sensitive, distinctive, connected, environmentally sustainable, accessible, safe and healthy, plus reference to innovation in design.
Warwick District Local Plan	DS3	16	Strategic principles for high quality new development
Warwick District Local Plan	DS15	27	Refers to the comprehensive development of strategic sites and cross references with policy BE2 (see below)
Warwick District Local Plan	SC0	83	High level principles including design principles
Warwick District Local Plan	BE1	84	Sets out 17 (a-q) design principles that development proposals should demonstrate
Warwick District Local Plan	BE2	86	Requires development briefs for significant housing sites (defined as 200+ homes), and sets out principles which should be included

A strategic design principles policy is expected to cover the following:

- Comprehensive development - ensuring development is designed and delivered in a coordinated way, and avoiding piecemeal schemes.
- Attractiveness – creating a pleasant environment to live and work.
- Sensitive to context – responds to its surroundings.
- Distinctiveness – builds upon the unique characteristics of its surroundings and/or creates a unique sense of place in itself.
- Connectedness (also tackles aspects of ‘healthy’) - weaves into existing networks of different scales
- Safety – ensures layout and orientation create spaces and overall environment that feels safe and secure to be in.
- Environmental sustainability and adapting to climate change (links to policies in ‘A climate resilient and Net Zero Carbon South Warwickshire’ section)
- Mix and amount of development (links to D3 below) - getting the right range of complimentary uses

Q-D1.1: Do you agree that this is an appropriate range of topics for a strategic design policy? Y/N/DK

Q-D1.2: If no, please indicate why

This strategic policy should be supplemented by place specific policies building upon emerging evidence including the ‘Settlement Design Analysis’. Potential vehicles to deliver this are discussed below (D2).

Issue D2: Design Codes and design guides

Paragraph 128 of the NPPF promotes the use of design codes and design guides by Local Planning Authorities, and specifies that they should set out principles consistent with those identified in the National Design Guide, and the National Model Design Code. The extent of the geographic coverage of these codes or guides however, along with the degree of prescription within them, should be tailored to the circumstances and scale of change in each place.

In the context of a Part 1 plan, the extent of the areas such codes or guides might most appropriately cover, the responsibility and timing of their preparation, and the degree of prescription they might appropriately include, are therefore matters that could appropriately be considered within the policy of the plan. Given that we are at the ‘Issues and Options’ stage of the plan making process, and do not therefore have a defined spatial strategy, it is challenging to develop this policy concept at this point. Referencing it here is broadly intended to gain feedback on high level principles.

Current policy context

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.9	66	Lists where design principles and contextual analysis needed to inform proposals can be found, including development briefs, masterplans and design guides and statements.
Stratford-on-Avon District Core Strategy	Area strategies		Specific design policies and principles for different settlements across the district.
Warwick District Local Plan	DS15	27	Refers to the comprehensive development of strategic sites and cross references with policy BE2 (see below)
Warwick District Local Plan	BE2	86	Requires development briefs for significant housing sites (defined as 200+ homes), and sets out principles which should be included

The following options may not be mutually exclusive. A ‘mix and match’ approach might be appropriate depending on the preferred spatial strategy emerging later in the plan-making process.

Q-D2: Please select all options which are appropriate for South Warwickshire

Option D2a: Develop a South Warwickshire Design Guide

A single reference document. However, given the large geographical area this would cover, it would be challenging to tailor to the specifics of individual settlements or places, or guide significant change. This would need to be led by the Local Planning Authorities.

Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change.

This option could take a more comprehensive view of areas of change identified in the SWLP, rather than focussing on a development site or sites (which it could do in addition), with a view to guiding all development proposals. These would expand upon the place-based principles approach in the Stratford-on-Avon District Core Strategy and would be led by the Local Planning Authority (or both authorities if relevant), in collaboration with local communities. There may also be potential for some or all of this work to come forward through Neighbourhood Development Plans.

Option D2c: Develop design guides/codes for strategic development sites/locations.

Like the existing policies within Warwick District, this would seek to produce specific briefs for individual large scale development sites. These could be produced or led by the respective Local Planning Authority and/or by the developer(s) bringing forward the site.

Option D2d: None of these

Issue D3: Designing adaptable, diverse and flexible places

It is the intention to include policy on the creation adaptable, diverse and flexible places, incorporating the following principles:

- Creating varied and distinctive neighbourhoods which provide for local needs
- Ensuring a mix of land uses to provide for local needs
- Ensuring a range of densities within settlements appropriate to the function and character of the place.

This policy area may be addressed in the Strategic design principles set out in DS1 (or alternatively other policy areas such as [20-minute neighbourhoods](#)) and may not therefore ultimately be considered discretely in a preferred policy approach. However, there are options specific to this issue which may benefit from further exploration at this stage, most notably in respect of the approach to density. Current policy approaches (see table) across Warwick and Stratford-on-Avon differ, with Warwick specifying a minimum density of 30 d.p.h (with opportunities to increase from that minimum), and Stratford-on-Avon having no overarching minimum.

Density ranges within the plan have potential to influence the capacity of sites to deliver homes and infrastructure, and therefore the amount of greenfield land that may be necessary to meet South Warwickshire's needs. It also has a role in accessibility to infrastructure by means other than the car, and therefore supporting vitality and viability (hence the link to the principle of 20-minute neighbourhoods). This has to be balanced the prevailing characteristics of the place and its context.

All of these matters are identified in the National Model Design Code, and underlined by paragraph 124 of the NPPF ‘Achieving appropriate densities’.

The SWLP team have produced a **density guide** which illustrates typical housing densities found within the South Warwickshire Area.

The Settlement Design Analysis, includes high level assessments of the prevailing density ranges across a number of towns and villages within South Warwickshire as part of the evidence base which could determine the overall approach to density within the SWLP. In addition, the Urban Capacity Study identifies density ranges which could inform the policy approach.

To a significant degree, the approach to density in the SWLP is likely to be linked to the preferred spatial strategy (see [Refined Spatial Growth Options](#)). For example, a strategy focussed on rail access might seek higher densities in close proximity to railway stations. This would maximise the accessibility to the stations with a view to reducing reliance on the private car. Notwithstanding this link, there are a range of policy approaches to density as identified in the options below.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.9 s	66	Lists where design principles and contextual analysis needed to inform proposals can be found, including development briefs, masterplans and design guides and statements. No specific policy reference to density. Para 3.8.5 however suggests that some higher density development within the district has been considered inappropriate in the past.
Warwick District Local Plan	BE2	86	Specifies a minimum density of 30 d.p.h on greenfield sites. Supporting text (para 5.19) identifies that in town centre locations, and around transport interchanges, the density of development should be significantly higher than the minimum.

Q-D3: Please select all options which are appropriate for South Warwickshire

Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.

This would be similar to the current approach in Stratford-on-Avon. It may facilitate a more locally tailored approach to density, though there may be a risk that in some locations that the efficiency of the land use may not be as high. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.

Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h.

This would be similar to the approach of the current Warwick District Local Plan. It would set a minimum expectation across the whole of South Warwickshire irrespective of context, but in anticipation that this minimum is likely to be exceeded where context allows, for example in more urban areas. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.

Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire and specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.

This would draw upon the evidence base of existing density ranges across South Warwickshire (for example those ranges indicated in the Urban Capacity Study or the Settlement Design Analysis) and seek to replicate this. This might offer a more responsive approach to density, though it might not tackle matters of accessibility to public transport modes or other infrastructure referred to above. It also has the potential disadvantage of perpetuating patterns of development which could be considered less sustainable. For example, density is commonly reduced toward the edges of development sites and therefore the edges of settlements. This can make it more challenging to increase the density of extensions to those sites/edges.

Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places.

This approach would be different to recent local policy approaches, where the emphasis would be on accessibility to infrastructure including transport infrastructure. This approach would align with the suggestion in Paragraph 125 (e) of the NPPF. If a growth strategy focussed around sustainable travel were to be taken forward, there would be a clear synergy with this option. This option could also have a greater role in examining opportunities for densification in appropriate locations, and in determining the approach to any potential new settlements. The challenge of this approach is that it may result in a different density range in some places across South Warwickshire compared with the conventional approach.

Option D3e: None of these

Issue D4: Safe and attractive streets and public spaces

In addition to the strategic design principles set out earlier in this section (D1), a high-level policy in respect of public spaces, including streets is also suggested. This would draw upon relevant principles of [HealthyStreets](#) and would provide the foundation for further detailed policy in subsequent policy documents, and/or design codes. Street design should be considered in conjunction with other policy topics within the Issues and Options, including green infrastructure, climate adaptation, and creating healthy places, and is directly related to successful delivery of 20-minute neighbourhoods (see '[A Well Connected South Warwickshire](#)').

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.9	63-64	Attractive, sensitive, distinctive, connected, environmentally sustainable, accessible, safe and healthy, plus reference to innovation in design. Specifically parts 3, 4 and 6.
Warwick District Local Plan	BE1	84	Sets out 17 (a-q) design principles that development proposals should demonstrate – specifically c, f, i, k, m, o, p

A policy on the design of safe and attractive streets is expected to include the following:

- Prioritise the needs of those engaged in active travel – i.e. pedestrians and cyclists (links to and supports the underpinning of 20-minute neighbourhoods)
- Ensure that streets and spaces are appropriately enclosed by buildings or strong landscaping to clearly define public and private spaces
- Ensure streets and public spaces feel overlooked, safe and inclusive
- Legible street layout – minimising use of dead-end cul de sacs
- Quality of public realm, including adaptation for climate change – e.g. street tree planting

Q-D4.1: Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets? Y/N/DK

Q-D4.2: If no, please indicate why

Issue D5: Protecting and enhancing heritage assets

What you said:

- Concerns that heritage assets had not been adequately addressed within the Scoping and Call for Sites Consultation and where discussed only the most important heritage assets were referenced.
- Respondents felt the plan should outline an approach to avoid harm to designated and recognised heritage assets.

Heritage assets, both designated and otherwise, are crucial in maintaining the character of an area, and helping people connect to the past. The number of heritage assets within South Warwickshire, and the rich history attributed to them plays a significant role in making the area a desirable place to live, work and visit and their protection and enhancement is integral to creating a well-designed and beautiful south Warwickshire. Therefore, determining how to best protect and enhance heritage assets is an important aspect of the plan. This being said, there are numerous aspects relating to the preservation and enhancement of heritage assets that are not considered strategic, such as how historic buildings can be adapted in light of climate change, and how heritage assets can be enhanced to support the cultural offering of the area. These non-strategic aspects will be considered within part 2 of the plan.

Nonetheless, heritage is still an important consideration at the strategic level and has already been considered as part of the evidence base to inform the emerging growth options. As part of the

settlement design analysis discussed in more detail within the section '[D3: Designing adaptable, diverse and flexible places](#)' consultants were asked to conduct a Heritage and Settlement Sensitivity Assessment to determine the impact development may have on the heritage assets within various settlements, and this will be used when determining the growth strategy. Such an approach has been taken due to the value of heritage assets across the area, and by considering the heritage assets and their settings from the outset, any significant impacts can be avoided or if necessary, mitigated, and areas where development would help enhance heritage assets can be identified.

To compliment this evidence, it is proposed that part 1 of the local plan contains a high-level strategic policy that seeks to protect and enhance the existing heritage assets, drawing upon the existing policies within the Stratford-on-Avon Core Strategy and the Warwick Local Plan. Strategic policies would also utilise the numerous advice notes produced by Historic England, as well as Warwickshire County Councils [Heritage and Culture Strategy 2020-2025](#), and the guidance offered within the NPPF.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.8	58	Current policy seeks to protect and enhance the historic environment for its inherent value, and for the enjoyment of residents and visitors. Where proposals will affect heritage assets the level of harm will need to be considered against the level of public benefits. Where development does take place, proposals will be high quality, sensitively designed and integrated with the historic context.
Warwick District Local Plan	HE1	111	Development is not permitted if it results in substantial harm to or total loss of the significance of a designated heritage asset, unless it is demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or, a number of extenuating criteria are met.
Warwick District Local Plan	HE3	115	Development that would lead to the demolition or loss of significance of a locally listed historic asset will be assessed in relation to the scale of harm or loss and the significance of the asset. Change to locally listed historic assets should be carried out using traditional detailing and using traditional materials.
Warwick District Local Plan	HE4	115	Development will not be permitted that results in substantial harm to Scheduled Monuments or other archaeological remains of national importance, and their settings unless in wholly exceptional circumstances.

Q-D5: Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2? Y/N/DK

Heritage assets are undoubtedly important to the character of South Warwickshire and should be considered at a strategic level within Part 1 of the South Warwickshire Local Plan, helping inform the strategic growth strategy. Detailed heritage policies are will be deferred to part 2.

Q-D6: Please add any comments you wish to make about a well-designed and beautiful South Warwickshire

9: A healthy, safe and inclusive South Warwickshire

There is a lot of evidence which suggests that the places in which people live and work can have a profound influence over their physical and mental health. A paper written by Public Health England ‘Getting research into practice A resource for local authorities on planning healthier places’ suggests that poor health and illness is influenced by the environment in which people live [GRIP2 PHE national resources \(publishing.service.gov.uk\)](#). The environmental factors that influence health are known as wider determinants of health. Spatial planning can help to improve environments including creating places which are easier for people to be physically active in their daily routines and throughout their lifetime. Planning is important in helping to support strong, vibrant, healthy and equitable communities and good planning can have a positive impact on health and wellbeing. Where there are opportunities for active travel, this can help to deliver several health benefits to residents as well as enabling people to build exercise into their daily routines.

Chapter 8 of the National Planning Policy Framework sets out how planning policies and decision should help to achieve healthy, safe, and inclusive places [National Planning Policy Framework - 8. Promoting healthy and safe communities - Guidance - GOV.UK \(www.gov.uk\)](#).

At the initial Scoping and Call for Sites consultation stage, an initial HIA screening was undertaken to determine whether a HIA would be required on the Local Plan. The stage at which the HIA process should begin is at the Preferred Options stage as the Plan will contain detailed policies which can be screened and assessed against several criteria in order to determine whether they are likely to have a health impact. If the policy is likely to have an impact on health those policies can be evaluated against a set of outcomes which will be agreed jointly between the Council and Public Health.

Issue W1: Pollution

What you said:

- Congestion, pedestrian safety issues and air pollution issues will worsen with housing and educational site allocations around Warwick.
- Electric vehicles could lead to reduction in air pollution.
- Tree planting can absorb pollution.
- Heating systems can cause pollution such as log burners.
- There should be text around the need to reduce pollution in the air, land and in water systems.
- Tourism can be a contributory factor in pollution.

Air quality is a particular issue in several locations within Warwick and Stratford District and some of these have been declared as Air Quality Management Areas. Transport is one of the biggest causes in these areas and this can lead to impacts on health. There is already a high level of increased road traffic which leads to health impacts such as air pollution and noise pollution. There are challenges for those residents living in rural areas as they are very much car dependent, sometimes with poor

digital connectivity. Air pollution is not the only type of pollution that can cause issues. Consideration should also be given to noise and light pollution as these can cause harm to not only humans but also animals.

Air quality is a particular issue in a number of locations within Warwick and Stratford District and some of these have been declared as Air Quality Management Areas. Transport is one of the biggest causes in these areas and this can lead to impacts on health. There is already a high level of increased road traffic which leads to health impacts such as air pollution and noise pollution. There are challenges for those residents living in rural areas as they are very much car dependent, sometimes with poor digital connectivity. Consideration should also be given to other types of pollution such as noise and light pollution both of which are also issues.

Air quality issues relating to transport can have a disproportionate impact on areas that have a high level of deprivation. Planning Policy can help to address these by looking at issues such as edge of town centres/key road corridors into towns, increases in traffic and congestion leading to poor air quality and health and safety impacts within communities. It is possible that Air Quality may be considered as part of an Environmental Net Gain policy, for more information on this please refer to section '[Issue B5: Environmental Net Gain](#)'.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District District Core Strategy	CS.9. Bullet point 8	64	Pollution is referred to under a more general Design and Distinctiveness policy. The paragraph sets out that occupants of new and neighbouring buildings will be protected from unacceptable levels of noise, contamination and pollution and loss of daylight and privacy.
Warwick District Local Plan	TR2	92	The policy refers to pollution caused by traffic and does not permit development that would result in significant health impacts from this. Where proposed developments may significantly impact air quality within Air Quality Management Areas or the health and wellbeing of people in the area as a result of pollution, Air Quality Assessments together with a mitigation plan should be submitted.
Warwick District Local Plan	NE5	120	Development proposals should not give rise to soil contamination or air, noise, radiation, light or water pollution where the levels could cause harm to sensitive receptors.

Q-W1: Should the Part 1 plan include a policy on pollution? Y/N/DK

This policy would cover all pollution and would ensure that any development that would result in a significant impact on the health and wellbeing of people in an area as a result of pollution will not be permitted unless effective mitigation can be achieved. This policy should also look to protect those areas which are within Air Quality Management Areas by requiring air quality assessments and where necessary a mitigation plan to demonstrate practical and effective measures have been taken to avoid any adverse impacts.

Issue W2: Health Impact Assessments for major development

As well as a HIA of the policies at Preferred Options stage, consideration should be given to major planning proposals and whether applications for these should require a Health Impact Assessment to be submitted.

National Planning Policy Guidance refers to HIA's as a useful planning tool as they can help to address any major impacts that major development proposals may have on the health and wellbeing of the population [Healthy and safe communities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/healthy-and-safe-communities). This is also backed up by recent National Government Guidance published in 2020 on the use of Health Impact Assessments [Health Impact Assessment in spatial planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/health-impact-assessment-in-spatial-planning).

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	-	-	No current policies specifically requiring this.
Warwick District Local Plan	-	-	No current policies specifically requiring this.

Q-W2: Please select the option which is most appropriate for South Warwickshire

Option W2a: Include a policy on Health Impact Assessments.

Developers would be required to submit a Health Impact Assessment/Screening report for all major developments. This would ensure that health impacts have been adequately considered and if required mitigation measures are in place and would align with current national government guidance. A threshold of what constitutes a major development would need to be agreed.

Option W2b: Do not include a policy on Health Impact Assessments.

Although any major health impacts such as noise and pollution are likely to be picked up at the planning application stage it may not capture the cumulative health impacts in as much detail. There could also be the missed opportunity for addressing issues such as loneliness and isolation which is critical for rural communities.

Issue W3: Ensuring the Built Environment provides Healthy and inclusive communities

What you said:

- Health should be a fundamental aim of places to enable and support healthy lifestyle choices moving forward.
- There should be a healthy streets approach.
- Support for strategic sites as these can provide the necessary infrastructure encouraging healthy and safe communities as well as minimising the need for a car and travel.
- Increased connectivity and opportunities for active travel encourages healthy living.

The Council recognises the important role that spatial planning has in the creation of healthy, safe, and inclusive communities and that the places that we live in have a fundamental impact on health. Many of the policies of this Plan will have an impact on these matters, so it is important that community needs are supported through the provision of appropriate physical and social infrastructure. Facilities and services that contribute to improving people’s overall quality of life and their physical and mental health and well-being should be included, for example community facilities not only for social purposes but also as places where people can go should there be extreme weather conditions such as flooding or heatwaves.

Another important factor that can support healthy lifestyles is ensuring that sufficient land is made available to all for play, sport and recreation. Good access to open space can also facilitate social inclusion by bringing groups together also reducing isolation and loneliness in communities.

Levels of crime and disorder are important factors in determining where people want to live. Everyone should be able to feel safe in their surroundings as this is a key contributor to people’s quality of life and a fundamental element of community cohesion. Well-designed places will help people to feel safe and secure and safety is identified as a key component of the design principles policy (see Chapter 8), in line with the principles identified in para 130 of the NPPF.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District District Core Strategy	CS.25.	207	The policy ensures that appropriate infrastructure such as open space, health services and community facilities, green infrastructure is provided as part of new developments.
Warwick District Local Plan	DS3	16	The Council will expect development that enables new communities to develop and sustain themselves. As part of this, development will provide for the infrastructure needed to support communities and businesses, including: a) physical infrastructure (such as transport and utilities); b) social infrastructure (such as education, sports facilities, and health); c) green infrastructure (such as parks, open space and playing pitches).

Warwick District Local Plan	HS1	96	An overall health policy which aims to support proposals that seek to provide healthy, safe, and inclusive communities through design, affordable homes, energy efficiency, safe and attractive public realm, opportunities for physical activity, access to green infrastructure and accessibility to key services & infrastructure
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Q-W3: Please select the option which is most appropriate for South Warwickshire

Option W3a: Include an overall policy on health.

This policy would aim to address all aspects of health and assist in creating communities which are safe, healthy, and inclusive for everyone across South Warwickshire as a whole. This would build on the existing health policies in both the Warwick District Local Plan and the Stratford Core Strategy.

Option W3b: Do not include a policy on health.

This would mean that health is not picked up at a strategic level within part 1 of the plan and there could be a missed opportunity to make communities as safe, healthy and inclusive as possible. It could be included within part 2 where more detailed specific health policies would be developed.

Issue W4: Public Open space for Leisure and Informal Recreation

What you said:

- Having ample green space was a key priority for respondents to the Scoping Consultation and many listed the need for open green space for their health and wellbeing, as well as for wildlife.
- COVID highlighted the importance open green space and access to it
- The majority of respondents agreed that large scale development should deliver substantive areas of greenspace, however there was also an emphasis on the provision of smaller green open spaces within urban areas
- Concerns were raised regarding the feasibility of providing green open spaces as part of all developments, and how open green space is to be managed going forward.

Public Open Spaces, in whatever form they come, are valuable community assets that have significant benefits for people’s health and wellbeing, as well as additional environmental and economic benefits such as cultural enjoyment and tourism. In line with the policies contained within the NPPF it will be necessary for the South Warwickshire Local Plan to consider the provision of public open space, and to ensure there is enough space for people to spend time in, whether this be for leisure or recreational purposes. Public open space can come in many forms, some of which include:

- Amenity Green Space
- Children and Young Peoples Equipped Play Facilities
- Parks and Gardens
- Unrestricted Natural Accessible Greenspace and Natural Areas (including woodland)
- Allotments, Community Gardens/Orchards, Urban Farms
- Outdoor Sport/Recreation Grounds

A special mention should also be made for blue corridors such as rivers and canals, which can provides space for people to spend time outside and often provide direct routes for active travel. The existing Core Strategy and Local Plan policies both address the need to create open space for people in order to improve access, promote healthy and active communities, and improve quality of life, and both plans set out specific thresholds and requirements. Public Open space will be addressed as the plan progresses, however it is not considered a strategic issue to address within part 1. Further evidence will need to be collated to determine the level of need within the Local Plan Area, and until this is determined, current thresholds will be carried forward. Given the length of the plan period it is possible that the Public Open space requirements will change, and thus it will be important that the policy is flexible enough to reflect any changes to the need, as identified through the evolving evidence base.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.25	207	The provision of new and enhanced community, cultural, sport and leisure facilities will be encouraged as a way of promoting healthy, inclusive communities. Where appropriate, new community uses will be required as an integral part of residential developments. They are to be located where they are accessible by all reasonable sustainable modes of transport by potential users. New housing development will enable an increase in or enhancement of open space and recreation facilities to meet the needs of its residents. Where it is justified by the scale of new development, developers will be expected to contribute towards the provision of open space in order to help achieve the standards set out in the Council’s Open Space, Sport and Recreation Assessment.
Warwick District Local Plan	HS1	96	Support will be given to proposals that: <ul style="list-style-type: none"> - contribute to the development of a high-quality, safe and convenient walking and cycling network; - contribute to a high-quality, attractive and safe public realm to encourage social interaction and facilitate movement on foot and by bicycle; - seek to encourage healthy lifestyles by providing opportunities for formal and informal physical activity, exercise, recreation and play - improve the quality and quantity of green infrastructure networks and protect and enhance physical access, including public rights of way to open space and green infrastructure
Warwick District Council Public Open Space SPD			The Warwick District Council Public Open Space SPD sets out the specific requirements for public open space across the District.

Q-W4: Please add any comments you wish to make about a healthy, safe and inclusive South Warwickshire

10: A well-connected South Warwickshire

The way settlements are laid out can impact on people’s travel choices. For settlements to be sustainable, it is beneficial to maximise any opportunities for people to be able to meet their regular day to day needs within a reasonable walking distance of their homes. This concept is frequently referred to as the ‘20 minute neighbourhood’. As well as being able to meet day to day needs, there should be the option for people to be able to travel sustainably outside of their settlements to access facilities by providing a good range of sustainable travel choices.

As well as the physical connections of new settlements, digital connectivity including broadband and mobile, are of increasing importance to people and businesses in South Warwickshire. Fast and reliable connections are vital for effective communication across businesses, education, entertainment, and social users. For the purposes of the Part 1 plan, it is proposed that digital connections are included as part of a policy on broader infrastructure requirements.

Further detailed policies on this topic will be explored in a Part 2 plan.

Issue T1: 20-minute neighbourhoods

What you said:

- Support was given for 15/20-minute neighbourhoods.
- Support for mixed use developments ensuring that key infrastructure is located close to where people live including GP surgeries, jobs, open space, schools, and community centres/hubs.
- Joined up layout is important with emphasis on walking and cycling.
- Connectivity should include the concept of reducing distance and time, such as the 20-minute neighbourhood.

Within settlements, it is considered beneficial to maximise opportunities for people to meet their regular day-to-day needs near to where they live (and/or work), and to do this within a reasonable walking distance of their homes (and/or workplace). This affords the choice of walking (or cycling) wherever possible as a realistic alternative to the private car. Principles associated with this theory are often referred to as ‘the 20-minute neighbourhood’. The 20-minute neighbourhood is being utilised internationally based on a core assumption that most day-to-day needs should be met within a reasonable walking distance of home – a 10-minute walk there, and a 10-minute walk back. Both the Royal Town Planning Institute (RTPI) Scotland and the [Town and Country Planning Association](#) (TCPA)¹ have published research and guidance papers on the merits of this approach, citing multiple health and climate change benefits which arise from it. This supports the three pillars of sustainable development identified in the NPPF (paragraph 8 – social objective, economic objective, and environment objective), and aligns with the overarching objectives of the SWLP.

¹ TCPA (2021) [Guide to the 20-Minute Neighbourhood](#)

The principles of the 20-minute neighbourhood have underpinned the development of the 'settlement design analysis' (ADD LINK) undertaken on some settlements across South Warwickshire with a view to this informing the evolution of the spatial strategy options. There is a case that this might form the basis of a policy within the SWLP.

Current policy context

There is no specific policy in either the Stratford-on-Avon District Core Strategy or the Warwick District Local Plan which directly refers to 20-minute neighbourhoods. Some principles of 20-minute neighbourhoods are however touched upon within different policies throughout both documents, and references to other design approaches such as [Building for a Healthy Life](#) (the update to Building for Life 12) broadly cover similar principles.

Q-T1: Please select all options which are appropriate for South Warwickshire

Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development.

It might be considered more appropriate to consider such matters in the context of specific locations and places, but in this scenario it would not apply consistently across South Warwickshire within the Part 1 SWLP.

Option T1b: Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g. Building for a Healthy Life) within a broader overarching policy.

This would recognise its relevance to the overarching principles of the SWLP, but suggest it doesn't warrant a bespoke policy. Alternatives may also be offered. This would raise the profile but not guarantee that a single approach would be consistently adopted across South Warwickshire.

Option T1c: Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals.

This would set out very clear the vision and expectations for new developments and places, to ensure early design incorporation.

Issue T2: Sustainable transport accessibility across South Warwickshire

South Warwickshire is predominantly rural in nature, although there are several densely populated urban areas which are connected by main roads. The predominant form of transport across South Warwickshire is private car, however this will need to change in order to address climate change and create more sustainable communities. If there is a gradual move away from residents relying on the use of a private car it will bring significant benefits such as improvement to health including improved mental health and wellbeing, improvements to obesity levels, air quality improvements and reduced levels of isolation and loneliness.

The current Local Transport Plan runs up to 2026 and is in the process of being updated by Warwickshire County Council [Warwickshire Local Transport Plan](#). A consultation on the draft Local Transport Plan is currently being undertaken and is due to end on the 20th November 2022. This sets out the needs, challenges, priorities, and objectives for transport throughout the County. The South Warwickshire Local Plan should look to align with these key transport strategies and priorities.

What you said:

- Priority should be given to infrastructure to enable active travel modes and sustainable transport.
- Focus should be on large towns that have links to sustainable transport options including the use of very light rail.
- Transport links between growth sites in Warwickshire and neighbouring authorities are important, especially with new sustainable transport advances such as very light rail.
- Measures such as reallocation of road space for sustainable transport and innovation are important and should be explored further.
- Promoting all forms of sustainable transport should be the strategic focus of the SWLP.
- Promoting better and more sustainable connectivity for shorter trips.
- Make walking and cycling infrastructure safe and integrate with new developments.
- Complete network of cycle lanes should be created.

Public transport provision which includes bus and rail is limited across South Warwickshire which can make accessibility to key services difficult, however due to the rural nature of South Warwickshire, there are specific areas that are poorly accessible by public transport and therefore, communities are reliant on the use of the private car. Responses to the Scoping Consultation in 2021 suggested that public transport needs to be improved in terms of frequency and reliability of services as well as affordability.

Active travel options such as walking and cycling are also limited in some areas and often severance occurs which means that not all places are easily and well connected by these modes of travel. It is important to try and persuade residents to use alternative modes of transport if they have previously relied on the use of private car. Well planned green and blue infrastructure can create active travel links, as well as serve as a wildlife corridor for nature. The importance of Active Travel has gained increased traction and importance over recent years, particularly following the COVID-19 pandemic. Active Travel (which incorporates walking and cycling) is known to have significant health and wellbeing benefits and is also a good way to work against climate change by reducing the use of private vehicles. Green and Blue infrastructure corridors can encourage active travel by providing pleasant routes to various places. These routes can include greenways, canal towpaths and footpaths through nature.

There are several other reasons as to why it is important to improve sustainable travel across South Warwickshire, for example younger people who can't drive find it difficult to access opportunities to develop skills and employment opportunities. Further, public transport options are limited for those residents who need to access more specialist types of healthcare facilities and emergency treatment, for example hospitals, specialist cancer treatment centres without a car. For example, University Hospital in Coventry is the major trauma centre for South Warwickshire. If residents need to visit family members and they do not have access to a car it can make accessibility difficult.

There is a need to acknowledge that not all active and public transport options work for everyone as it very much depends on individual circumstances. There are several alternative options to consider alongside the everyday sustainable transport modes of cycling, walking, bus and rail including options for e scooters, car sharing schemes, technology driven demand responsive transport and car clubs. These alternative options may help those families to travel more sustainably where traditional

public and active travel modes are difficult. There are also options to look at park and ride schemes across South Warwickshire which could act as wider hubs for sustainable travel.

Consideration should also be given to low traffic neighbourhoods, streets where schools are located and the restriction of motorised vehicles during drop off and pick up times and ensuring that there is a good network of sustainable transport options including connections to and between rail and bus stations.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.26	213	Policy wording requiring consistency with priorities set out in the LTP and encouraging modal shift to more sustainable modes of transport. Specific wording in relation to new development and ensuring mitigation against unacceptable transport impacts.
Warwick District Local Plan	TR1 – TR5	90-95	TR1 is quite generic in terms of requirements as it covers a range of things such as design, providing suitable access for all transport modes and EV as well as taking into account needs of people with disabilities by all modes of transport. TR2 relates to health impacts from transport and links to Air Quality. The remaining policies are specific relating to infrastructure, safeguarding of sites and aerodromes.

Q-T2: Please select the option which is most appropriate for South Warwickshire

Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure.

This would be based on those living in rural areas, urban areas etc. It could include making changes to car parking standards and lowering them in areas where there are good active/public transport links in place such as in main urban centres. The policy would explore opportunities to use existing green and blue infrastructure as potential active travel options. The policy should also ensure that proposals are in line with the priorities as set out in the Local Transport Plan such as promoting and looking at alternative options for sustainable travel, e.g. car club initiatives, e scooters etc.

Option T2b: Do not include a policy which takes a hierarchical approach.

There could be a general policy on sustainable transport which requires the necessary infrastructure and services (including the use of existing green and blue infrastructure) in place to allow both existing and new communities to become more sustainable and to have much easier access to key services and facilities. This would be regardless of whether residents live in rural or urban areas and could be an expansion of Policy CS.26 in the Core Strategy. This could also include a section on ensuring that proposals are in line with the priorities as set out in the Local Transport Plan. If a hierarchical approach is not taken it may still lead to those residents who have good access to public transport still continuing to use their cars for everyday use as there would be little incentive to change travel habits.

Issue T3: Road travel, employment, and freight

What you said:

- SWLP should allocate housing and employment growth near existing sustainable transport infrastructure.
- Acknowledge that sites for commercial/employment development may need to be situated near to the SRN due to the need for quick transport of goods and being close to consumers and the supply chain.
- Car transport is needed for the economy and commuting.
- Acknowledge that car travel will still be an option for people and various activities so rather than completely aim to eradicate it, should promote low emissions vehicles such as EV.

Active travel and public transport should be given high importance and be prioritised in terms of available space on the road network and influencing new development, however there is still an acknowledgement that there will be a need for people to travel by private car for several reasons. Walking and cycling are good means of sustainable transport but predominantly for shorter journeys. Where journeys are likely to be longer (10km and above) and for purposes such as employment, weekly food shopping, childcare commitments, alternative modes of transport may be more appropriate including travel by car. It is important to acknowledge this but to encourage a shift away from fossil fuel powered cars.

Road travel will continue to be important for employment use and transport facilities that will support efficient freight journeys through and within Warwickshire will need to be provided. There is currently a large amount of work being undertaken to upgrade the A46 in order to bring it in line with expressway standards and improve traffic flows.

There are several ways in which travel by private car and freight can be more sustainable. Electric vehicles or the use of low and zero emissions vehicles should be encouraged which includes making the necessary infrastructure to support this easy and readily accessible. Further, there could be the introduction of low emission zones, workplace parking levies and the possibility of looking at active travel for 'last mile' freight journeys (the very final stage of delivery) or driverless delivery pods whereby battery powered autonomous vehicles will be used to deliver goods.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.26	213	Policy wording requiring consistency with priorities set out in the LTP and encouraging modal shift to more sustainable modes of transport. Specific wording in relation to new development and ensuring mitigation against unacceptable transport impacts.
Warwick District Local Plan	TR1 – TR3	90-95	TR1 is quite generic in terms of requirements as it covers a range of things such as design, providing suitable access for all transport modes and EV as well as taking into account needs of people with disabilities by all modes of transport. TR2 relates to health impacts from transport and links to Air Quality. The remaining policies are specific relating to infrastructure, safeguarding of sites and aerodromes.

Q-T3: Please select the option which is most appropriate for South Warwickshire

Option T3a: Include a policy encouraging more sustainable road-based transport for businesses.

It is acknowledged that employment and businesses will still need to operate using roads as their predominant form of transport particularly for the distribution of goods. This policy would encourage businesses to become more sustainable such as by using electric vehicles, introducing low emission zones, workplace levies, looking at the possibility of ‘last mile’ freight journeys (the very final stage of delivery) or driverless delivery pods whereby battery powered autonomous vehicles will be used to deliver goods. This could also include measures required in order to mitigate against any unacceptable impacts that road-based travel from business/employment may have on the environment such as poor air quality. This will help in meeting the climate change aspirations of the plan.

Option T3b: – Do not include a policy encouraging more sustainable road-based transport for business.

This may be beyond the scope of the Part 1 plan as it could be picked up under a more general sustainable transport policy rather than specifically for business and employment. If it is not considered to be a strategic issue for Part 1, a detailed policy could be developed as Part 2 of the plan.

Issue T4: Smart Cities

“Smart Cities” refers to a broad range of data-led and automated processes which aim to help cities and towns work more smoothly. The aim is to provide citizens with social, economic, and environmental benefits, whether in urban or rural areas. Some smart cities ideas are already in operation in parts of the UK, for example:

- Traffic light timings which respond to traffic flows to ease congestion
- ‘Live’ timetable information at bus stops
- Streetlights which adjust their brightness according to the activity around them

The Parliamentary Office of Science and Technology (POST) has published a note which summarises some of the key drivers and barriers to smart city implementation:

<https://post.parliament.uk/research-briefings/post-pn-0656/>

It is anticipated that smart cities ideas will become more widespread and integrated in future. This is likely to bring with it a greater demand for data and communications infrastructure. There are also challenges balancing the benefits with concerns about data security and privacy.

The SWLP will seek to enable and foster the delivery of smart cities ideas, where practical. In particular the aim is to ‘future-proof’ new development, to avoid inadvertently constraining new technologies.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	-	-	No policy
Warwick District Local Plan	-	-	No policy

Q-T4: Please provide suggestions for how smart cities technologies could be supported in South Warwickshire

Q-T5: Please add any comments you wish to make about a well-connected South Warwickshire

11: A biodiverse and environmentally resilient South Warwickshire

Strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire is a key component to creating a sustainable development plan, and with Central Governments ambition to help the natural world regain and retain good health it is important that this objective is considered throughout the development process. This local plan objective seeks to protect environments that already exist, and to maximise the opportunities for enhancement through various means. The most substantive of which includes the proposed Environmental Net gain approach, which would be the first of its kind within a Local Development Plan. The benefits of a biodiverse and environmentally resilient South Warwickshire extend beyond just the environmental benefits, with the climate, economy, flooding, health, and wellbeing also known to benefit from a thriving natural world.

This section also considers area designations that consider landscape, character, and setting, and other important environmental issues such as minerals and agricultural land.

Issue B1: Areas of Restraint

Areas of restraint are another designation specific to Stratford-on-Avon District. They are not considered landscape designation but are designed to protected areas of open land which serve to preserve the structure and character of various settlements. These areas can include relatively small, or larger areas within or adjacent to settlements and their overriding purpose is to protect the inherently open nature of certain areas. Areas of Restraint are not referenced within the National Planning Policy Framework however are used within the Core Strategy to show the importance of open land within and around urban areas.

To ensure a consistent approach across the plan area a single approach is desirable. Up to date landscape evidence will be used to inform decision making on this issue.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.13	79	Land designated as an Area of Restraint makes an important contribution to the character of the settlement. Development must not harm or threaten the open nature of such areas, taking into account any possible cumulative effects. Planning permission for a large-scale form of development in an Area of Restraint will only be granted where a scheme would have demonstrable community benefits and contribute

			significantly to meeting an objective of the Core Strategy. It will also need to be demonstrated that no suitable alternative site outside the Area of Restraint is available for the proposed development. Projects which enhance the character and visual amenity of Areas of Restraint will be encouraged, as will the promotion of beneficial uses such as public access, nature conservation and food production.
Warwick District Local Plan	N/A	N/A	N/A

Q-B1: Please select the option which is most appropriate for South Warwickshire

Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District

Maintaining Areas of Restraint as a strategic policy approach will help protect parcels of land that help preserve the structure and character of settlements within the plan area. As part of identifying areas in Warwick Stratford designations would be reviewed.

Option B1b: Remove Areas of Restraint designations

Remove the Areas of Restraint from Stratford-on-Avon District and continue without them within Warwick District. Open areas of land that serve to preserve the structure and character of settlements will be considered by other means.

Option B1c: Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District.

This option sees a continuation of the current approach. Stratford-on-Avon would maintain its Areas of Restraint and Warwick District continues without this designation. This would result in a disjointed approach.

Issue B2: Vale of Evesham Control Zone

The Vale of Evesham Control Zone seeks to control the number of additional HGV movements within the area resulting from development, thereby reducing the impact on local communities. The Policy is only relevant to Stratford-on-Avon District as the Vale of Evesham does not extend into Warwick District. The Vale of Evesham Policy is reliant on collaboration with the neighbouring districts of Wychavon and Cotswolds, for it to work effectively. The existing Local Plans of Wychavon and Cotswold District Councils both contain a similar policy on the Vale of Evesham Control Zone. However, both Districts are reviewing their local plans and there is a question as to whether policies on the Vale of Evesham Control Zone will be carried forward. Should the bordering Districts not decide to carry the Vale of Evesham Control Policy Forward there would be little merit in maintaining the policy within the South Warwickshire Local Plan.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.14	81	<p>Within the Vale of Evesham Control Zone business-related proposals which would result in a 5% or greater increase in Heavy Goods Vehicles traffic will need to demonstrate that:</p> <ol style="list-style-type: none"> 1. the economic benefits of the development, particularly to the local community, outweigh the impact of the increase in HGV traffic; 2. the development cannot be accommodated on a site with better access to the Heavy Goods Vehicles Route Network 3. the supply and distribution routes proposed to serve the development are the most appropriate with regard to impacts on the amenity of local communities.
Warwick District Local Plan	N/A	N/A	N/A

Q-B2: Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation forward?

Y/N/DK

The Vale of Evesham Control Zone relies upon collaboration between local authorities and HGV Haulers to work effectively. If neighbouring authorities removed the policy designation then there would be little merit in South Warwickshire continuing with it in isolation. Do you agree that if Wychavon and Cotswold District Councils remove the Vale of Evesham Control Zone, that South Warwickshire should follow suit?

Issue B3: Special landscape areas

What you said:

The scoping and call for sites consultation did not include a question on Special Landscape Areas, however there was a general consensus that people feel strongly about the protection and enhancement of landscape areas, with concerns about development negatively impacting the landscape.

Special Landscape Areas are another landscape designation specific to Stratford-upon-Avon District. Special Landscape Areas are areas of high quality landscape, that also contain associated historic and cultural features. SLA's seek to protect, enhance and facilitate better management of the best of the area's landscapes outside the Cotswolds AONB. Development within the Special Landscape Areas therefore needs to be considerate of its surrounding landscape and not have a harmful impact on the distinctive character or appearance of the area. Stratford-upon-Avon's Special Landscape Areas were determined during the creation of the Core Strategy following the information provided

through the Special Landscape Area Study (2012) and drawing upon information found within the National Landscape Character Area profiles. The information within this study can now be considered out of date, so should there be appetite to carry this designation forward, an updated study would need to be undertaken.

Special Landscape areas are not encouraged within England through national policy or through Natural England’s approach, as was also the case in 2012. Despite this, it was still felt that there was merit in designating Special Landscape Areas and there are a number of other Councils that have opted to maintain Special Landscape Areas, including Cotswold District Council to which South Warwickshire shares a boundary. Given the rural nature of South Warwickshire and the unique landscape characters across the area, it is important that development is considerate of the local vernacular. Should Special Landscape Areas not be carried forward, it would be necessary to protect existing landscapes through other means.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.12	77	The high landscape quality of the Special Landscape Areas, including their associated historic and cultural features, will be protected by resisting development proposals that would have a harmful effect on their distinctive character and appearance. The following Special Landscape Areas are identified: <ul style="list-style-type: none"> • Arden • Cotswold Fringe • Feldon Parkland • Ironstone Hills Fringe Development proposals relating to settlements that lie within a Special Landscape Area must respect the current and historic relationship of that settlement within the landscape.
Warwick District Local Plan			N/A

Q-B3: Please select the option which is most appropriate for South Warwickshire

Option B3a: Introduce Special Landscape Areas across all of South Warwickshire

Introducing Special Landscape Areas across all of South Warwickshire would see existing SLA’s refreshed/maintained and areas of Special landscape quality introduced within Warwick District. Developments within Special Landscape Areas would have to respect the current and historic relationship of that settlement within the surrounding landscape. To determine whether the existing SLA’s within Stratford remain relevant and where any SLA’s within Warwick should be located, an updated study would need to be undertaken.

Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District

Keeping Special Landscape areas within Stratford-on-Avon District and not introducing them within Warwick District would lead to a disjointed approach, but one that maintained the status quo.

Option B3c: Discard Special Landscape Areas and bolster general landscape policy

Discarding Special Landscape Areas within Stratford-on-Avon would bring it in line with the approach of the existing Warwick Local Plan. If this approach were taken forward developments would be considered using a general landscape policy.

Issue B4: Protecting the Cotswold Area of Outstanding Natural Beauty (AONB) and its surrounding areas

The Cotswold Area of Outstanding Natural Beauty (AONB) covers 104km of the Local Plan Area, and already affords a significant amount of protection through the National Planning Policy Framework. When considering development in and around the Cotswold AONB, regard should be given to conserving and enhancing the natural beauty of the area. In particular, great weight should be given to conserving and enhancing the landscape and scenic beauty, including its 'special qualities'. This includes development proposals within and outside the AONB that could have an adverse impact on its natural beauty. This includes impacts on views from and to the AONB, landscape character and tranquillity. Any development also needs to consider the policies as set out in the Cotswold AONB Management Plan.

The use of a buffer around the AONB would ensure that due regard is given to potential impacts of development outside the AONB, on the beauty of the AONB as well as its setting, and to ensure that great weight is given to these impacts, where appropriate, in line with paragraph 176 of the NPPF.

Terminology

In recent years there has been a shift in the terminology used when discussing the Cotswold Area of Outstanding natural Beauty (AONB). Whilst the Cotswold AONB remains the formal name for the designation, Cotswold National Landscape is a commonly used alternative. Both names refer to the same designation, and are often used interchangeably. For the purpose of this local plan the term Cotswold AONB will continue to be used.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.11	74	Development proposals affecting the Cotswolds AONB should conserve and enhance the special landscape qualities and scenic beauty of the AONB and be consistent with the objectives set out in the Cotswolds AONB Management Plan. The parts of the AONB that lie within the plan area are defined as ‘tranquil areas’ where the minimisation of noise, traffic congestion and light pollution is a priority. Large scale development will not be allowed unless exceptional circumstances and public interest are demonstrated in accordance with all the criteria set out in the National Planning Policy Framework.
Warwick District Local Plan	N/A	N/A	N/A

Q-B4: Please select the option which is most appropriate for South Warwickshire

Option B4a: Maintain the current policy approach, without the use of a buffer

Maintaining the current policy approach in line with National Planning Policy Framework would result in little to no change in the level of protection afforded to the Cotswold AONB.

Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape

Creating a buffer zone around the Cotswold AONB would help ensure regard is given to the potential impacts of development outside of the National Landscape, on the natural beauty of the National Landscape. It is possible that a distance based buffer is used around the entirety of the special landscape area (e.g 3km), or alternatively a sinuous buffer based on landscape sensitivity in different areas is created in consultation with the Cotswold Conservation Board. This would mean that the buffer is thicker in some areas than others, and could be identified as a special landscape area. Details of the buffer would be considered as the plan progresses should this option be preferred. However, it is worth noting that the level of protection afforded to the Cotswold AONB would not change. Such an approach may simply help officers when determining planning applications.

Issue B5: Environmental Net Gain.

What you said:

- Support for the protection and enhancement of our green areas and associated habitat/biodiversity, and for this to include appropriate compensatory measures.
- Prioritisation of the mitigation hierarchy
- Concerns that compensatory measures are not adequate, and that development should be directed to brownfield sites where compensatory measures are not required,
- Many noted how compensatory measures and any net gain needs to be proportionate, justifiable, viable and deliverable

Historically, national guidance and Local Plans, by following the mitigation hierarchy (Figure 25), have focused on protecting, and limiting negative impacts on protected sites and species. This has largely been achieved through Biodiversity Net Gain (BNG) where developments are required to compensate for any impacts on habitat either through enhancing existing habitats or creating new ones (if impacts are unavoidable). This compensation can take place either on or off-site. Biodiversity Net Gain used to be discretionary and at a Local Authorities request, however, the new Environment Act has made a 10% Biodiversity Net gain a statutory requirement. Biodiversity net gain, however, only focuses on one aspect of nature’s recovery. As such, since 2012 there has been a shift towards Environmental Net Gain, which covers a broader scope and is delivered through nature-based solutions.

Natural Capital

The elements of nature that directly or indirectly produce value to people, including ecosystems, species, freshwater, land, minerals, the air and oceans, as well as natural processes and functions

(National Capital Committee 2017)

Supported within the Government’s 25 Year Environment plan, environmental net gain is an approach to development that leaves the environment in a measurably better state than prior to development. It looks holistically at various ecosystem services including air quality, water quality, carbon offsetting and biodiversity, and addresses these in tandem to enhance the wider ‘natural capital’ of an area. The 4 ecosystem services that Environmental Net Gain could include are explained below

Table 15 – The 4 ecosystem services that Environmental Net Gain could include

<p style="text-align: center;"><u>Air Quality</u></p> <p>Sometimes development can impact air quality, which can negatively affect peoples’ health. Air quality can be improved using natural solutions such as trees and green roofs, and can also be addressed physically by ensuring dwellings and other buildings, such as schools, are suitably positioned/protected from high concentrations of poor air quality, either through distance or natural barriers such as hedges.</p>	<p style="text-align: center;"><u>Water Quality</u></p> <p>Water quality can sometimes be affected following development, for example through surface water runoff. Flooding and poor drainage systems can also impact water quality. Beyond ensuring development does not result in an increased risk of flooding, a number of solutions such as suds and rain gardens, can be used to maintain and improve water quality.</p>
<p style="text-align: center;"><u>Carbon offsetting</u></p> <p>Some developments may not be able to completely neutralise their carbon emissions and in these cases a carbon offsetting approach could be developed. This could include natural solutions such as the planting of trees to absorb carbon, or more developmental solutions such as funding existing housing stock to be retrofitted to help reduce the overall carbon emissions across the plan area.</p>	<p style="text-align: center;"><u>Biodiversity</u></p> <p>Some developments are unable to avoid negative impacts on local habitats and wildlife, and in these instances a biodiversity net gain is required. Biodiversity net gain can be achieved in many ways, including through natural solutions (e.g creating new and improved habitats or utilising SUDS) to more physical solutions such as bird boxes and hedgehog holes.</p>

In assessing the approach of Environmental Net Gain in relation to infrastructure, the National Infrastructure Commission identified many benefits, including:

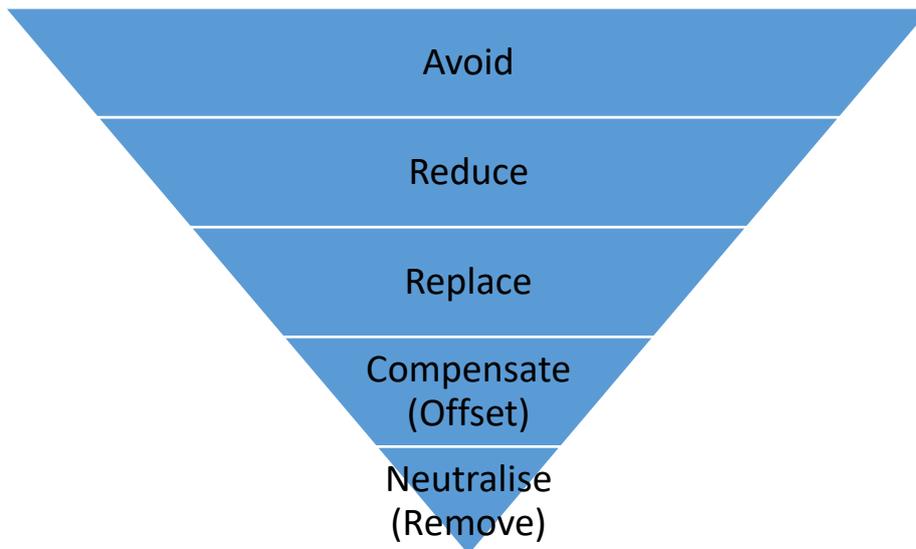
- supporting natural capital by mitigating against climate change and flood risk, improving air and water quality, and improving quality of life
- delivering benefits efficiently, for example both achieving an infrastructure goal and increasing resilience
- saving time and money by avoiding the risks of costly and lengthy appeals processes due to environmental concerns
- being a positive approach that ensures losses in high value natural capital are minimised and mitigated while also providing opportunities to enhance natural capital, given that biodiversity loss is hard to reverse.

The benefits of environmental net gain are considered to be superior to those achieved through biodiversity net gain alone, given the wider scope of environmental enhancement, and the additional benefits for people. There is not yet an agreed assessment or approach to achieve environmental net gain, which provides an exciting opportunity for South Warwickshire and the South Warwickshire Local Plan. Already adept at biodiversity offsetting, South Warwickshire, in partnership with the County Council, has valuable knowledge and resources that make it a suitable forerunner in this approach. It is possible that there may be various ways to approach environmental net gain, and with the variety of ecosystem services involved it may provide more flexibility to developers as well as enhanced benefits for the environment, people, and the economy. Whilst caution needs to be taken to prevent a negative ‘tradeoff’ between ecosystem services, it may be that where some sites are constrained in one sense, they are able to make up their environmental net gain in other areas, helping with viability issues and other constraining factors such as space.

This will not however, be to the detriment of a 10% Biodiversity Net Gain, which will still be a **minimum** requirement under the Environment Act.

There is much work to be done to explore environmental net gain further, and this has been supported through the Natural Environment Investment Readiness Fund project, which seeks to explore polices, investment opportunities and market establishment. The findings from this report demonstrate that such an approach would have a far superior impact than the current system, and help South Warwickshire reach net carbon zero and other demonstrable environment gains.

Figure 25 - Mitigation Hierarchy



Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	CS.6	48	<p>Development will be expected to contribute towards a resilient ecological network throughout the District that supports ecosystems and provides ecological security for wildlife, people, the economy and tourism. Biodiversity Net gain is encouraged, however reducing the impacts of development on biodiversity is considered the priority. Existing habitats to be protected include:</p> <ul style="list-style-type: none"> - Sites of Special Scientific Interest (SSSI's) - Irreplicable habitats such as Ancient Woodlands - Designated sites including Local Wildlife Sites and Local Nature reserves - Non-designated sites that are known to make a positive contribution to biodiversity - Areas that comprise or host habitats and species of principle conservation importance <p>Developments that are likely to have an adverse effect upon a site designated through the EC Habitats Directive or Birds Directive will not be permitted.</p>

Warwick District Local Plan	NE2	118	Designated areas and species of national and local importance for biodiversity and geodiversity are protected: - Sites of National Importance - Sites of Local Importance: a) Ancient Woodland, aged and veteran trees; b) Local Nature Reserves; c) Local Wildlife Sites and potential Local Wildlife Sites; d) Local Geological Sites; e) Protected, rare, endangered or priority species or other sites of geological or geomorphological importance. Unless it can be demonstrated that the benefits of development clearly outweigh the nature conservation value or scientific interest of the site.
Warwick District Local Plan	NE3	119	New development will be permitted provided that it protects, enhances and / or restores habitat biodiversity. Development proposals will be expected to ensure that they: a) lead to no net loss of biodiversity, and where possible a net gain b) protect or enhance biodiversity assets and secure their long term management and maintenance, c) avoid negative impacts on existing biodiversity. Where this is not possible, mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be required.

Q-B5: Please select the option which is most appropriate for South Warwickshire

Option B5a: Explore and pursue an integrated Environmental Net Gain Policy

*To consider Environmental net gain as a new and pioneering approach to support nature's recovery. Should this approach be taken, further work will be required to determine how environmental net gain will work in practice. However, it is expected that it will allow more flexibility for developers, and result in more tangible environmental, social and economic improvements. This approach will not be to the detriment of Biodiversity Net Gain, of which a **minimum** 10% net gain will still be required under the Environment Act, the flexibility will be made around this legal requirement to enhance the natural capital of an area.*

Option B5b: Explore environmental net gain through separate policies

*A more targeted, and arguably less flexible approach to Environmental net gain would be to have separate policies for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. With each policy having its own requirements. Each ecosystem service would be viewed and dealt with in isolation, risking a disjointed approach. As per the Environment Act, a **minimum** 10% Biodiversity Net Gain will be required as part of this approach.*

Option B5c: None of these

Issue B6: Wildbelt designations

Wildbelt is a new approach to aiding Natures Recovery that looks at designating land specifically for environmental enhancement. The wildlife trusts are currently striving to ensure that by 2030, 30% of our land and seas are managed for natures recovery, and believe that whilst there are many designations protecting areas of environmental importance, there are no designations for areas of land in need of improvement. Wildbelts therefore seek to identify and designate areas of land with currently low biodiversity value, and protect them whilst the necessary work is undertaken to support natures recovery, either through creating new habitats or bringing nature back. Such areas for Wildbelt designation could include agricultural land that is being reverted to species-rich grassland; land in local communities that's being managed to enhance its biodiversity and give people more nature on their doorstep, or lengths of grass verges that could be enhanced to help create corridors for wildlife. The idea of Wildbelts is that it protects the space that nature needs for the future.

Wildbelts would work alongside existing designations, such as National Parks and SSSI's, and could be used to help connect existing areas of ecological importance to one another, as well as helping to speed up the creation of Local Nature Recovery Strategies, as land and space has already been reserved for such enhancement. More detail on Wildbelts, and other actions the Wildlife Trusts support can be found in their report ['Planning – A new way forward'](#)

As this is a new approach, promoted by Wildlife Trusts and supported by Government, neither the Stratford-on-Avon Core Strategy nor the Warwick Local Plan have existing policies of this nature. The introduction of Wildbelt designations would be new and pioneering.

Current Adopted Policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	N/A	N/A	N/A
Warwick District Local Plan	N/A	N/A	N/A

Q-B6: Should the South Warwickshire Local Plan introduce Wildbelt designations? Y/N/ DK

Designate areas of Wildbelt across the Local Plan Area to support nature’s recovery and the Wildlife Trust’s goal to have 30% of our land and sea managed for nature by 2030.

Issue B7: Minerals

Warwickshire County Council produces a Minerals Plan, which includes policy regarding mineral safeguarding and extraction. The Minerals Plan defines broad ‘safeguarding areas’ for different types of mineral reserves, and policy in the plan seeks to avoid needless sterilisation of these reserves by large scale development. The Minerals Plan also allocates specific sites where mineral extraction is intended. Stronger policy relates to allocations, to ensure that development on or near the allocated sites does not prevent extraction of the mineral resource.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	-	-	No policy.
Warwick District Local Plan	NE5	120	Developments expected to demonstrate that they do not sterilise mineral resources of particular importance unless extraction is not feasible prior to development taking place.

Q-B7: Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP? Y/N/DK

Where possible, the SWLP will seek to signpost to relevant policies in other documents, rather than duplicating or paraphrasing these policies. It is not within the scope of the SWLP to produce its own distinct policy regarding minerals. This approach also avoids difficulties of varying plan periods for different plans.

Issue B8: Agricultural Land

Land is a finite resource, and its role in food production is of high importance. It is recognised that national and international events may increase demand for UK-grown food in future, if importing food becomes more difficult or more expensive. Local food production has benefits in reducing carbon emissions from transportation, and community growing can have health and social benefits for those involved. Provision of allotments and community orchards is covered in section [W4 – public open space for leisure and informal recreation](#).

In the face of national and global events and the climate emergency, farmers may be experiencing competing pressures. For example to maximise the productivity of their land, while at the same time moving to less carbon-intensive farming practices and increasing biodiversity through for example tree planting and through the growing demand for solar and wind farms. This is a complicated balance, the details of which are largely beyond the scope of the South Warwickshire Local Plan. However, from a climate change point of view these rural land uses have a key role to play in decarbonising our communities and economy and well as linking with adaptation. They also provide the opportunity for multiple benefits such as combining food production with solar production or tree planting.

Part 2 of the SWLP is expected to provide detailed policy to support the diversification of agriculture, while maintaining a balance regarding carbon emissions and enhancing soil health, biodiversity and enjoyment of the countryside.

Large scale development can use significant areas of land. Similar pressures can also arise from environmentally focused schemes such as solar farms and carbon off-setting. One key role the SWLP can play is ensuring that where possible the best agricultural land is retained in productive use.

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon District Core Strategy	AS.10	192	Seek to avoid the loss of large areas of higher quality agricultural land
Warwick District Local Plan	NE5	120	Developments expected to demonstrate that they avoid the best and most versatile agricultural land unless the benefits of the proposal outweigh the need to protect the land for agricultural purposes.

Q-B8.1: Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development? Y/N/DK

Agricultural land is graded 1-5 according to its quality and versatility for producing a range of crops. The ‘best and most versatile’ land (grades 1, 2 and 3a) is that which is most flexible, productive and efficient.

Q-B8.2: When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?

Issue B9: Protecting Biodiversity and Geodiversity assets

South Warwickshire has a rich array of biodiversity and geodiversity assets. These are valued for their environmental, scientific, educational, historic, aesthetic and social benefit. Some of these sites are of national importance – Sites of Special Scientific Interest (SSSIs) – and as such are afforded statutory legal protection. Other sites are of local importance, and it falls to Local Plans to determine the appropriate level of protection.

Sites of local importance include:

- Ancient Woodland, aged and veteran trees;
- Local Nature Reserves;
- Local Wildlife Sites and potential Local Wildlife Sites;
- Local Geological Sites.
- Protected, rare, endangered or priority species or other sites of geological or geomorphological importance.

South Warwickshire does not have any designated sites of international importance (Special Areas of Conservation, Special Protection Areas, or Ramsar sites).

Local Geological Sites are selected by a panel of representatives from Warwickshire Geological Conservation Group (WGCG), Natural England and Warwickshire Museum. The list is maintained by WGCG and forms part of the Geodiversity Action Plan.

<https://www.wgcg.co.uk/geodiversity-action-plan/>

Current adopted policy

Policy document	Policy reference	Page no.	Policy Summary
Stratford-on-Avon Core Strategy	CS.6	48	<p>Developments with an adverse effect on a site designated through the EC Habitats Directive or Birds Directive will not be permitted.</p> <p><i>Biodiversity</i> – Proposals expected to minimise impacts on biodiversity and where possible secure net gain. Safeguarding is required of sites of national and local importance, and other non-designated sites known to make a positive contribution to biodiversity, unless the benefits of development clearly outweigh the harm. If harms cannot be mitigated onsite, offsetting is required elsewhere in the area.</p> <p><i>Geodiversity</i> – Proposals expected to safeguard Local Geological Sites and other features of geological interest, and where possible, conserve and enhance these features.</p>

Warwick District Local Plan	NE2	118	<p><i>Sites of national importance</i> – Development not permitted which would destroy or adversely affect these unless, in exceptional circumstances, the benefits of the proposal clearly outweigh the need to protect the site.</p> <p><i>Sites of local importance</i> – Development not permitted which would destroy or adversely affect these unless the benefits of the proposal clearly outweigh the need to protect the site. Proposals are subject to an ecological assessment.</p>
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Q-B9: Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites. Y/N/DK

Sites of national importance are protected by national policy, so duplication of that policy is not strictly necessary in the SWLP. However, as SSSIs form part of a hierarchy of protection, it makes sense in this case to reference these sites within the plan. The current policy approaches in Stratford and Warwick are broadly similar but not identical. Each policy covers a slightly different selection of non-designated biodiversity or geodiversity assets, and there are variations in the level of flexibility given for balancing harms against the benefits of development. This option applies the policy to a broad range of non-designated assets, and includes flexibility while providing a high bar intended to minimise adverse impacts on these sites.

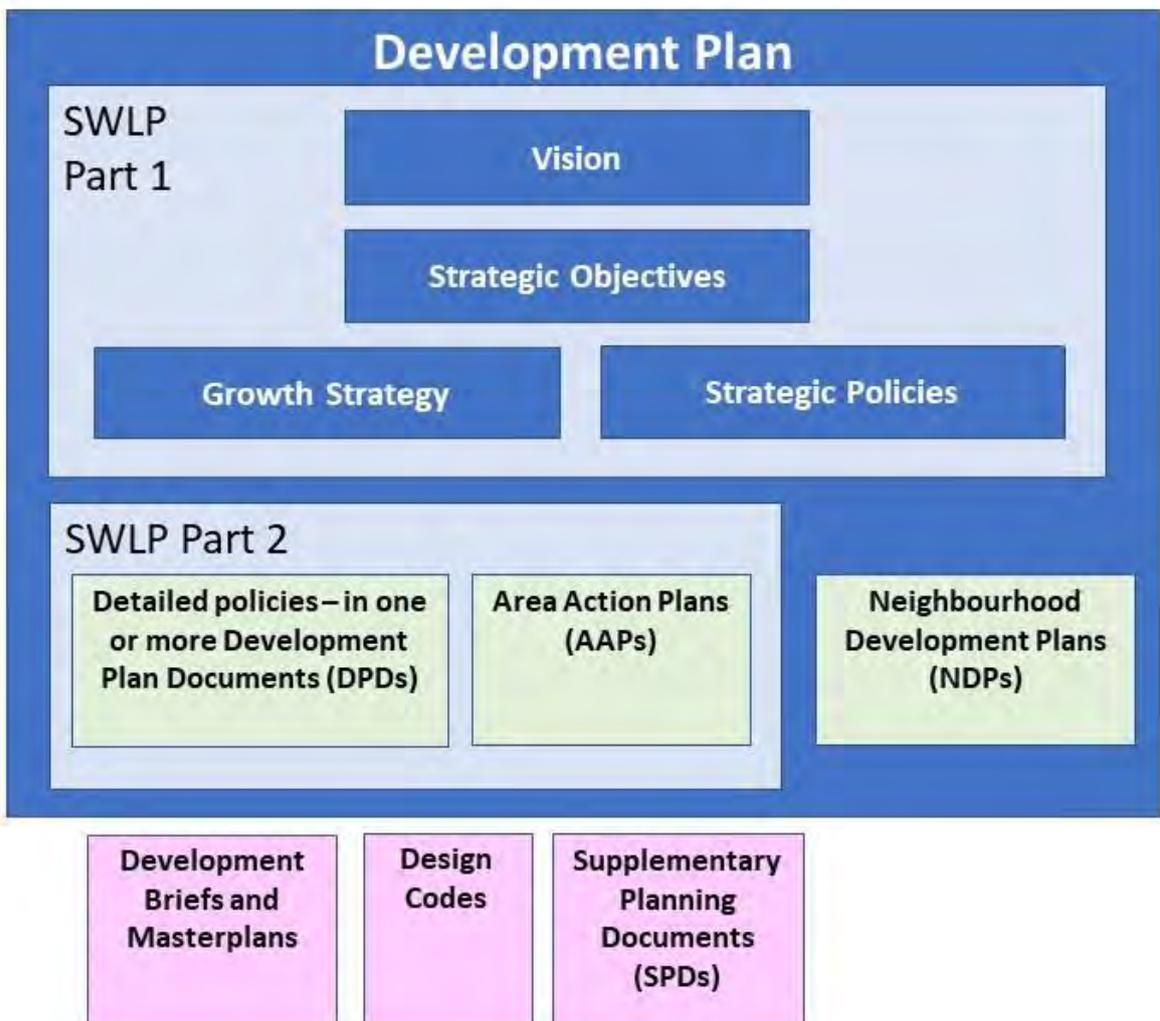
Q-B10: Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire

12. Plan content

Issue P1: Part 1 and Part 2 plans

The South Warwickshire Local Plan will be divided into two parts. Part 1 would be a single document, while Part 2 could consist of multiple documents. Neighbourhood Development Plans would form part of the wider Development Plan for South Warwickshire, but would not fall within either Part 1 or Part 2. There are also various other aligned documents which sit outside of the Development Plan, including Development Briefs, Masterplans, Design Codes and Supplementary Planning Documents. Figure 26 shows the proposed structure of the SWLP.

Figure 26 - Proposed structure of the South Warwickshire Local Plan



Each part of the plan is expected to cover the following areas:

Table 16 - Part 1 plan – proposed broad contents

Content	Explanation
Growth strategy	Setting out broad locations for growth to 2050
Strategic site allocations and broad locations	For example, large urban extensions, or new settlement locations. Depending on the situation, strategic sites may be allocated in Part 1; or broad locations may be indicated, with allocation coming in Part 2.
Development principles for strategic sites	Setting out high level principles for comprehensive development of strategic sites
Green Belt boundary	If it proves necessary to add or remove land from the Green Belt, these changes would be made in Part 1
Allocation of other sites as necessary for short-term development	To ensure sufficient sites can come forward in the first years after adoption, to maintain a healthy 5 Year Housing Land Supply
High level and strategic policies	Policies which have a material influence on the growth strategy – i.e. which would influence where growth happens

Table 17 - Part 2 plan – proposed broad contents

Content	Explanation
Strategic site allocations	Those strategic sites which were indicated with broad locations in Part 1, would be allocated in Part 2
Smaller and non-strategic site allocations	Providing further detail to the broad locations set out in the growth strategy in Part 1
Detailed policies	This may be in the form of one or more Development Plan Documents (DPDs). Some topics may have further clarification in Supplementary Planning Documents (SPDs).
Area Action Plans	Area Action Plans (AAPs) are a type of DPD that provide policy and guidance for a specific geographical area, e.g. for a particular town
Neighbourhood Development Plans	While not strictly sitting within the Part 2 plan, NDPs form part of the development plan

Table 18 - Other associated documents which do not form part of the development plan

Content	Explanation
Design codes	Design codes may be developed for defined areas, certain neighbourhood types, and / or for South Warwickshire as a whole
Development briefs and masterplans	Large strategic allocations are likely to have their own development brief and masterplan
Supplementary Planning Documents	Documents which provide more detailed advice or guidance on policies in an adopted local plan. These can be topic-based or location-based.

**Q-P1.1: Do you agree with the proposed broad content of the Part 1 plan?
Y/N/DK**

Q-P1.2: If no, please indicate why

What you said:

66% agreed with the approach of starting with a high-level, strategic part 1 Local Plan. The most common arguments in favour were to expedite the plan making process, providing clarity and certainty for developers and communities, and to allow focus on the strategic priorities. 19% did not feel a part 1 plan was the best approach. The most common arguments against this approach were the timescales for the second part to come forward, and the potential impact of a lengthy plan process on the 5 Year Housing Land Supply. Also highlighted were potential confusion and uncertainty, particular with regard to the allocation of sites in smaller villages.

This Issues and Options consultation is concerned with the Part 1 plan. This plan will cover only high-level and strategic policies. The existing 2016 Stratford-on-Avon District Core Strategy and 2017 Warwick District Local Plan each contain a mixture of strategic and non-strategic policies. This means that consideration must be given to which policies should be addressed in Part 1, and how to handle those policies which will not be addressed in Part 1.

The 2017 Warwick District Local Plan identified which policies were considered ‘strategic’; the 2016 Stratford-on-Avon District Core Strategy did not. There is no hard and fast definition of what constitutes a ‘strategic’ policy. When determining which policies to address in Part 1, a slightly broader selection has been used than the 2017 Warwick plan, in order to cover all the policies which have a material impact on the growth strategy – i.e. those policies which would influence where growth happens. Policies will be addressed in one of the following ways:

Table 19: Table of possible actions for Part 1 and Part 2 plans

Action	Explanation	How this is indicated in the tables below
Addressed in Part 1	This could mean: Adopting an identical policy <ul style="list-style-type: none"> • Adjusting or re-working a policy • Creating a new policy on the same subject 	Cells shaded blue
“Saved” for Part 2	The current adopted policy remains in force for each Local Planning Authority Area until such time that a Part 2 plan is adopted. Saving a policy to be addressed in Part 2 is not a judgement on the importance of the topic or the quality of the existing policy; it merely defers the consideration of that topic until a later date.	Cells shaded pink
Some elements addressed in Part 1 and some elements saved for Part 2	Some policies contain a mixture of strategic and non-strategic elements. In such cases, new policy in Part 1 may supersede the strategic elements, while non-strategic elements are saved for Part 2.	Cells shaded purple
Deleted at the adoption of Part 1	Where non-strategic policies are already considered to be obsolete, there is no benefit in saving them for Part 2. Instead, these will be identified and deleted on adoption of Part 1.	Cells shaded yellow

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The tables that follow list all the policies in the current adopted plans for Warwick and Stratford-on-Avon, and indicate which policies will be addressed in Part 1 and which in Part 2. A further table shows topic areas where neither plan currently has a policy, but which are intended for inclusion in Part 1.

Q-P1.3: Do you agree with the selection of policies to be addressed in the Part 1 plan? Y/N/DK

Q-P1.4: If not, please indicate why

Stratford-on-Avon District Core Strategy 2016

Table 20: Proposed action for policies in the Stratford-on-Avon District Core Strategy 2016

Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
CS.1	Sustainable Development	Presumption in favour of sustainable development Principle to secure a high quality environment, managed economic growth and social equity. Development to contribute to character and quality of District and wellbeing, located and designed to contribute to and maintain sustainable communities.	Policy addressed in Part 1	Considered strategic for SWLP
CS.2	Climate Change and Sustainable Construction	Development to include measures to mitigate and adapt to impacts of climate change. List of measures inc. SuDS, Heating and Cooling, GI and Biodiversity. High sustainability standards in buildings encouraged, promotion of energy hierarchy. Non-residential to comply with BREEAM 'Good' standard. Extensions or major refurbishments to demonstrate energy performance improvement	Policy addressed in Part 1	Considered strategic for SWLP
CS.3	Sustainable Energy	Provision to be made for renewable and low-carbon energy generation through a number of means. Solar and Wind energy supported where impacts can be made acceptable and subject to a range of listed criteria an in accordance with Renewable Energy Landscape Sensitivity Study. Biomass energy supported where impacts are made acceptable and subject to a range of listed criteria	Policy addressed in Part 1	Considered strategic for SWLP
CS.4	Water Environment and Flood Risk	Development to take into account predicted impact of climate change on water environment in relation to: Flood Risk areas – Sequential approach to development in flood risk areas Surface water runoff and SuDS	Policy addressed in Part 1	Considered strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
		Enhancing and protecting the water environment Water Quality		
CS.5	Landscape	Development to minimise and mitigate impact, inc. cumulative impact, and where possible improve landscape character and quality. Range of criteria listed to be satisfied	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP. However, some elements will be covered in new Green Infrastructure policy.
CS.6	Natural Environment	Development to contribute towards a resilient ecological network that supports ecosystems and provides ecological security. Developments likely to have an adverse impact on designated site will not be permitted. Development to minimise impacts and where possible secure a net gain on biodiversity in line with mitigation hierarchy, range of criteria listed. Development that affects geological features need to safeguard and where possible enhance features.	Policy addressed in Part 1	Considered strategic for SWLP
CS.7	Green Infrastructure	Existing GI network to be promoted through protection, enhancement, restoration and creation. Development to demonstrate how they contribute to this network.	Policy addressed in Part 1	Considered strategic for SWLP
CS.8	Historic Environment	Historic environment will be protected and enhanced, prioritising those listed that contribute to the character and identity of the district. Proposals affecting the significance of a heritage asset Appreciation, design and management	Some elements addressed in Part 1, some elements saved for Part 2	The overall protection of heritage assets is considered strategic for SWLP; details of how this is achieved is considered non-strategic.
CS.9	Design and Distinctiveness	Development to improve the quality of the public realm. Range of listed factors to ensure high quality design Design innovation encouraged Factors to be considered regarding advertisements.	Some elements addressed in Part 1, some elements saved for Part 2	Most of this policy is considered strategic for SWLP, but part D (advertisements) is considered to be non-strategic
CS.10	Green Belt	Purposes of Green Belt upheld by resisting inappropriate development within it, except in cases where very special	Policy addressed in Part 1	Considered strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
		<p>circumstances are justified in accordance with national policy.</p> <p>List of development that is not appropriate in the Green Belt</p> <p>Two areas of land removed from Green Belt:</p> <p>ALC3 north of Arden Road, Alcester (7ha)</p> <p>REDD2 Gorcott Hill, north of Mappleborough Green (9.8ha)</p>		
CS.11	Cotswolds Area of Outstanding Natural Beauty	<p>Development within or affecting AONB should conserve and enhance the special qualities and scenic beauty of the AONB and be consistent with objectives in Cotswolds AONB Management Plan, and take into account economic and social wellbeing of the area.</p> <p>Areas of AONB in District are ‘tranquil areas’ where minimisation of noise, traffic congestion and light pollution is a priority.</p> <p>Large scale development in line with national policy</p> <p>Small scale development appropriate in line with AS10 but must not harm quality and character of the AONB</p>	Policy addressed in Part 1	Considered strategic for SWLP
CS.12	Special Landscape Areas	<p>Landscape quality of the SLAs to be protected by resisting development that would have a harmful effect, including cumulative impact.</p> <p>4 SLAs identified within the District (Arden, Cotswold Fringe, Feldon Parkland, Ironstone Hills Fringe)</p>	Policy addressed in Part 1	Considered strategic for SWLP
CS.13	Areas of Restraint	<p>Development must not harm or threaten open nature of AOR taking into account cumulative effects</p> <p>Large scale development only permissible if has community benefits and contributes to Core Strategy objectives, and no suitable alternatives outside of AOR.</p> <p>Development that enhances AOR will be encouraged.</p>	Policy addressed in Part 1	Considered strategic for SWLP
CS.14	Vale of Evesham Control Zone	<p>Business related development in the Zone which result in a 5%+ increase in HGV traffic need to satisfy a number of listed criteria</p>	Policy addressed in Part 1	Considered strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
CS.15	Distribution of Development	Distribution based on pattern of balanced dispersal based on Main Town, MRCs, New Settlements, LSVs, Large Rural Brownfield Sites, Other Settlements, Local Needs Schemes. Development in settlements to be considered against a range of listed criteria, larger developments to require a masterplan setting out a range of listed aspects.	Policy addressed in Part 1	Considered strategic for SWLP
CS.16	Housing Development	To meet the OAN for 14,600 homes to be distributed in line with CS15. Strategic allocations listed NDPs encouraged to identify sites to meet or exceed housing requirements Phasing and Delivery as per trajectory SAP will identify Reserve Housing Sites to meet agreed housing requirement inc. that arising in C&W HMA and to need arising outside of C&W. Criteria for when Reserve Sites will be released.	Policy addressed in Part 1	Considered strategic for SWLP
CS.17	Accommodating Housing Need Arising from Outside Stratford-on-Avon District	Plan to be reviewed if evidence demonstrates significant housing needs arising outside of District that should be met within the District and cannot be met adequately without a review.	Policy addressed in Part 1	Considered strategic for SWLP
CS.18	Affordable Housing	Affordable Housing requirements and thresholds dependent on location. Requirement for 35% Requirements relating to onsite provision, affordability and tenure, on-site integration and delivery.	Some elements addressed in Part 1, some elements saved for Part 2	Some elements of this policy are considered strategic while others are considered non-strategic for SWLP
CS.19	Housing Mix and Type	New homes to contribute to balanced and sustainable communities by meeting identified local and district housing needs in terms of mix, size, tenure and type. Preferred type and mix for general needs housing set out. Specialist accommodation supported if meets a range of listed criteria Flexible design encouraged	Some elements addressed in Part 1, some elements saved for Part 2	Some elements of this policy are considered strategic while others are considered non-strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
CS.20	Existing Housing Stock and Buildings	Proposals will not result in the net loss of dwellings through demolition or change of use unless there is a specific and overriding justification. Requirements in relation to alterations and modifications, replacement dwellings and empty homes.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
CS.21	Gypsies and Travellers and Travelling Showpeople	Proposals for new G&T pitches to be considered against a range of criteria listed. G&T Local Plan to identify sites but consideration to be given to pitch provision as a component of allocated sites where appropriate.	Policy saved, to be addressed in Part 2	Provision of pitches is considered strategic and will be addressed in Part 1. Policy CS.21 dealt with matters which are considered non-strategic for SWLP
CS.22	Economic Development	Economic development promoted in sustainable locations Provision to be made for at least 35ha of employment land primarily for B1a and B1b Further 19ha in allocations REDD1 and REDD2 100ha at GLH to enable expansion of JLR and 4.5ha for Aston Martin Laguna Flexible approach to accommodating wide range of employment generating uses. Loss of employment uses resisted unless not longer viable or appropriate. Knowledge based and other high value added sectors encouraged.	Policy addressed in Part 1	Considered strategic for SWLP
CS.23	Retail Development and Main Centres	Retail and commercial development to strengthen function and character of town and rural centres. Roles of main town and MRCs to be supported through encouragement of new and enhanced shopping and other business and community uses. Locations identified for large scale retail and commercial development SAP to identify sites for large scale retail development.	Policy addressed in Part 1	Considered strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
		Sequential approach to large scale retail development		
CS.24	Tourism and Leisure Development	<p>Role of tourism to be increased by supporting growth and improvement of existing and encouraging new and dispersing throughout the District.</p> <p>Large scale schemes or overnight accommodation should be located in Stratford or MRCs. Elsewhere need to be considered against a range of factors listed.</p> <p>Small scale development supported where appropriate to size and role of settlement and/or nature of location.</p> <p>Access to canals and waterways encouraged.</p> <p>Development to be sensitive to character and maximise benefits to communities affected</p> <p>Should be located in existing or replacement buildings where possible</p>	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP. Some elements will be picked up in strategic policies on other topics.
AS.1	Stratford-upon-Avon	Range of principles listed for development within Stratford-upon-Avon area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.2	Alcester	Range of principles listed for development within Alcester area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.3	Bidford-on-Avon	Range of principles listed for development within Bidford-on-Avon area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.4	Henley-in-Arden	Range of principles listed for development within Henley-in-Arden area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
				covered in other policy topics
AS.5	Kineton	Range of principles listed for development within Kineton area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.6	Shipston-on-Stour	Range of principles listed for development within Shipston-on-Stour area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.7	Southam	Range of principles listed for development within Southam area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.8	Studley	Range of principles listed for development within Studley area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.9	Wellesbourne	Range of principles listed for development within Wellesbourne area	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered non-strategic for SWLP, although some elements will be covered in other policy topics
AS.10	Countryside and Villages	Applies to areas outside BUABs for Stratford and MRCS, GLH, LAM and large brownfield sites. To maintain vitality of rural communities and strong rural economy provision to be made for wide range of activities	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered to be non-strategic for SWLP. However, the general principals of sustainable development are considered

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
		and development in rural areas, proposals to be assessed against principles of sustainable development as listed. Requirements for community, residential, business, tourism and leisure listed.		strategic, and will be covered in overarching policy elsewhere in the document.
AS.11	Large Rural Brownfield Sites	Reuse and redevelopment of extensive PDL sites in countryside outside of Green Belt to be assessed against a range of listed criteria. Approach set out to specific sites at Gaydon, Former Engineers Resource Depot (Long Marston), Former Southam Cement Works (Long Itchington), Former Harbury Cement Works (Bishops Itchington),	Policy addressed in Part 1	Considered strategic for SWLP
CS.25	Healthy Communities	Suitable arrangements to improve infrastructure, services and community facilities alongside development to mitigate its impact and integrate it within the existing community. Existing community facilities to be retained unless a number of criteria listed are met. When justified by scale new housing development to contribute towards open space in line with set standards. Consideration to more diverse forms of provision where respond to local needs and make a positive contribution to local environment. Design of new open space Loss of public or private open space without suitable replacement resisted unless a number of criteria are satisfied.	Some elements addressed in Part 1, some elements saved for Part 2	Provision of infrastructure as part of development is considered strategic for SWLP and will be covered in broad infrastructure policy. Details of the extent and type are considered non-strategic, as are the criteria around retaining existing facilities.
CS.26	Transport and Communications	Development to be consistent with LTP with emphasis on encouraging modal shift Developments permitted if mitigation provided in line with a range of listed criteria Encourage provision of EV charging points in development	Some elements addressed in Part 1, some elements saved for Part 2	Provision of infrastructure as part of development is considered strategic for SWLP and will be covered in broad infrastructure policy. Details of the extent and

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
		<p>Parking Standards to reflect local circumstances and have regard to need to promote sustainable transport. Council to produce SPD guidance on parking standards</p> <p>Support and safeguard land for strategic transport schemes in IDP and also reinstatement of railway line from Stratford to Long Marston.</p> <p>Aviation to be supported at Snitterfield and Wellesbourne</p> <p>Information and Communications Technologies – development to contribute to and be compatible with local fibre and high speed broadband infrastructure.</p>		<p>type are considered non-strategic.</p>
CS.27	Developer Contributions	<p>To introduce a CIL</p> <p>Affordable Housing and local infrastructure essential for development to take place or to mitigate impact will be secured through planning obligations, on-site where appropriate.</p> <p>To be provided concurrently or in advance of development and have regard to phasing of housing delivery.</p>	Policy addressed in Part 1	<p>Considered strategic for SWLP</p>

Warwick District Local Plan 2017

Table 21: Proposed action for policies in the Warwick District Local Plan 2017

Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
DS1	Supporting Prosperity	Ensuring sufficient and appropriate employment land is available within the district to meet the existing and future needs of businesses	Policy addressed in Part 1	Considered strategic for SWLP
DS2	Providing the Homes the District Needs	To provide in full for the OAN for housing and for unmet housing need arising from outside the District where this has been agreed. To include AH, Specialist Housing and G&T	Policy addressed in Part 1	Considered strategic for SWLP
DS3	Supporting Sustainable Communities	Promoting high quality new development inc. design, heritage, regeneration protection of significant assets, delivering low carbon economy and environmental sustainability	Policy addressed in Part 1	Considered strategic for SWLP
DS4	Spatial Strategy	Focussing growth within and adjacent to built up areas. Majority of growth in main urban areas of Warwick, Leamington, Whitnash and Kenilworth and on southern edge of Coventry. Some growth in growth villages. Allocations to take account of a number of criteria.	Policy addressed in Part 1	Considered strategic for SWLP
DS5	Presumption in Favour of Sustainable Development	Positive approach to development that reflects the presumption in favour of sustainable development	Policy addressed in Part 1	Considered strategic for SWLP
DS6	Level of Housing Growth	Provision to be made for 16,776 new homes between 2011 and 2029. Annual requirement 600 2011/12 to 2016/17 and 1,098 for 2017/18 to 2028/29	Policy addressed in Part 1	Considered strategic for SWLP
DS7	Meeting the Housing Requirement	Housing requirement to be split between a number of categories	Policy addressed in Part 1	Considered strategic for SWLP
DS8	Employment Land	Provision to be made for a minimum of 66ha of employment land to meet local need	Policy addressed in Part 1	Considered strategic for SWLP
DS9	Employment Sites to be Allocated	Additional 19.7ha employment land to be allocated at 2 strategic sites – Thickenhorn, Kenilworth (8ha) and Stratford Road, Warwick (11.7ha). 6.5ha to be accommodated at allocated sub-regional site	Policy addressed in Part 1	Considered strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
DS10	Broad Location of Allocated Housing Sites	Split of allocated housing sites by typology e.g. urban brownfield, growth villages, rural areas, greenfield.	Policy addressed in Part 1	Considered strategic for SWLP
DS11	Allocated Housing Sites	List of housing allocations and associated infrastructure requirements	Policy addressed in Part 1	Considered strategic for SWLP
DS12	Allocation of Land for Education	Allocation of 2 sites for Education – Southcrest Farm, Kenilworth and Land at Myton.	Policy addressed in Part 1	Considered strategic for SWLP
DS13	Allocation of Land for a Country Park	Allocation of country park on land adjoining the Tachbrook	Policy addressed in Part 1	Considered strategic for SWLP
DS14	Allocation of Land for a Community Stadium and associated uses	Allocation of land at Myton, adjoining Warwick Technology Park as a Community Stadium	Policy addressed in Part 1	Considered strategic for SWLP
DS15	Comprehensive Development of Strategic Sites	Proposals for a number of residential allocations to represent a comprehensive development scheme for the whole site inc. identified infrastructure	Policy addressed in Part 1	Considered strategic for SWLP
DS16	Sub-Regional Employment Site	235ha land in vicinity of Coventry Airport allocated as major employment site	Policy addressed in Part 1	Considered strategic for SWLP
DS17	Supporting Canalside Regeneration and Enhancement	To prepare and adopt a Canalside DPD	Policy addressed in Part 1	Considered strategic for SWLP
DS18	Green Belt	To apply national policy to proposals within the Green Belt	Policy addressed in Part 1	Considered strategic for SWLP
DS19	Review of the Local Plan	Plan to be reviewed prior to the end of the plan period in the event of one of a number of circumstances or following review against national policy and evidence by March 2021.	Policy addressed in Part 1	Considered strategic for SWLP
DS20	Directions for Growth South of Coventry	Area of growth identified South of Coventry where comprehensive proposals are required with masterplans, development briefs etc. The area will be subject to early partial local plan review	Policy addressed in Part 1	Considered strategic for SWLP
DS21	Safeguarded Land	Safeguarded land identified so that it may be utilised if required to meet longer term strategic development needs beyond the Local Plan period – relates to S1 land south of Westwood Heath Road	Policy addressed in Part 1	Considered strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
DS22	Former Police HQ, Leek Wootton	Former Police Headquarters to be developed for housing. Need for masterplan and criteria for assessing applications against.	Policy addressed in Part 1	Considered strategic for SWLP
DS23	Land for outdoor sports and recreation in Kenilworth	Land at Castle Farm and Warwick Road to be allocated for outdoor sport	Policy addressed in Part 1	Considered strategic for SWLP
PC0	Prosperous Communities	Promoting sustainable economic development to support a thriving and vibrant economy in line with a number of principles listed.	Policy addressed in Part 1	Considered strategic for SWLP
EC1	Direction for new employment development	Sets out the detail of locations and criteria for locating new employment development to urban and rural areas	Policy addressed in Part 1	Considered strategic for SWLP
EC2	Farm Diversification	Criteria based assessment to permitting diversification of agricultural and land-based rural businesses	Policy addressed in Part 1	Considered strategic for SWLP as part of a wider topic on diversification of the economy
EC3	Protecting Employment Land and Buildings	Protecting employment outside of town centres unless certain criteria can be satisfied	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP. While the current use class order has revoked class B1, the policy is still considered to play a role in protecting other B2 and B8 uses.
TC1	Protecting and Enhancing the Town Centres	Town centres uses to be permitted in town centres if of appropriate scale in relation to role and function of the centre and non-shopping proposals do not compromise the shopping function.	Policy addressed in Part 1	Considered strategic for SWLP
TC2	Directing Retail Development	New retail should be located in retail areas as a first preference. Sequential approach then follows i.e. edge, out of centre.	Policy addressed in Part 1	Considered strategic for SWLP
TC3	Safeguarding Existing and Potential Retail Floorspace	Within retail areas defined changes of use to non A will not be permitted except in secondary retail areas where changes to hotels and assembly and leisure will be permitted	Policy to be deleted – consideration will be given to whether a replacement policy is achievable	Changes of use from retail to other commercial, business and service uses cannot be prevented under the current

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
				use class order. This policy is therefore considered to be obsolete.
TC4	Chandos Street Town Centre Development Allocation, Royal Leamington Spa Town Centre	Retail and other appropriate main town centre uses on the Chandos Street car park.	Policy addressed in Part 1	Considered strategic for SWLP
TC5	Providing for Shopping Growth in Royal Leamington Spa Town Centre	Large scale shopping development that satisfies sequential requirements will be permitted if satisfy a range of criteria listed.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TC6	Primary Retail Frontages	Change of use from A1 to A2/3/4/5 permitted if meet a range of criteria	Policy to be deleted – consideration will be given to whether a replacement policy is achievable	Changes of use from retail to other commercial, business and service uses cannot be prevented under the current use class order. This policy is therefore considered to be obsolete.
TC7	Secondary Retail Frontages	Change of use from A1 to A2/3/4/5 permitted if meet a range of criteria	Policy to be deleted – consideration will be given to whether a replacement policy is achievable	Changes of use from retail to other commercial, business and service uses cannot be prevented under the current use class order. This policy is therefore considered to be obsolete.
TC8	Warwick Café Quarter	Changes of use from A1 and A2 to A3 or A4 permitted	Policy saved, to be addressed in Part 2	The current use class order has changed the landscape regarding uses previously within class A. However, drinking establishments are now 'sui generis' meaning that this policy is considered

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
				to still hold some validity and is not wholly obsolete.
TC9	Royal Leamington Spa Restaurant and Café Quarter	Change of use from A1 to A3 permitted	Policy to be deleted – consideration will be given to whether a replacement policy is achievable	Changes of use from retail to restaurants and cafes are already permitted under the current use class order. This policy is therefore considered to be obsolete.
TC10	Royal Leamington Spa Area Action Plan (AAP)	Commit to preparation of AAP	Policy addressed in Part 1	Considered strategic for SWLP
TC11	Warwick Town Centre Mixed Use Area	A1, A2, A3, A4, A5, C1, D2 and B1 permitted within defined mixed use area of Warwick Town Centre.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TC12	Protecting Town Centre Employment Land and Buildings	Loss of existing employment within defined town centre employment areas will not be permitted.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP. While the current use class order has revoked class B1, the policy is still considered to play a role in protecting other B2 and B8 uses.
TC13	Protecting the Residential Role of Town Centres	Change of use from residential to non-residential areas in predominantly residential areas in town centres only permitted if proposed use maintains the residential character of the area	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TC14	Protecting Residential Uses of Upper Floors	Changes of use from residential to other uses on upper floors in the town centre will not be permitted	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TC15	Access to Upper Floors in Town Centres	Development that denies access to the upper floors of buildings within the town centres will not be permitted	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TC16	Design of Shopfronts	New or replacement shopfronts will be permitted where they satisfy a number of criteria	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TC17	Local Shopping Facilities	Sets out detail on changes of use in Local shopping Centres, protecting local shops outside of town and local shopping centres, and supports rural shops where they meet a need.	Policy saved, to be addressed in Part 2	The current use class order has changed the landscape regarding uses previously

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
		Loss of rural shops resisted unless a number of criteria are satisfied.		within class A. However, drinking establishments and hot food takeaways are now 'sui generis', and a new class F2(a) (Local community shops) was established. This means that this policy is considered to still hold some validity and is not wholly obsolete.
TC18	Farm Shops	New farms shops to be permitted where they meet a range of criteria listed.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
CT1	Directing New Meeting Places, Tourism, Leisure, Cultural and Sports Development	Sequential approach for new meeting places, tourism, leisure, cultural and sports development within town centres, edge of centre and out of centre	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
CT2	Directing New or Extended Visitor Accommodation	Hotels permitted in town centres in accordance with other policies. Other visitor accommodation in urban areas permitted if easily accessible by sustainable transport. In rural areas permitted in growth villages and should be proportionate to location.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
CT3	Protecting Existing Visitor Accommodation in Town Centres	Loss of visitor accommodation only permitted if certain defined criteria apply.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
CT4	Extensions to Tourism, Cultural and Leisure Facilities in Rural Areas	Extensions in rural areas permitted if a number of defined criteria are satisfied	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
CT5	Camping and Caravan Sites	Permitted if can be integrated into landscape, are in accessible location and do not generate significant traffic. Defined criteria for new buildings and conversion of existing buildings	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
CT6	Warwick Castle and St Mary's Lands, Warwick	Development permitted where brought forward with a masterplan containing a range of aspects listed	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
MS1	University of Warwick	Development permitted in line with a masterplan/development plan containing a range of aspects listed	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
MS2	Major Sites in the Green Belt	May be very special circumstances for further development at Honiley Airfield (automotive and motorsport industries) and Stoneleigh Park (rural innovation and equine activities). Masterplans, development briefs or planning applications that demonstrate that the sites continue to contribute to the green belt purposes will be supported.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
H0	Housing	The Plan will provide in full the district's housing requirement, in locations which enable sustainable lifestyles, protect most highly valued aspects, and which support and regenerate existing communities. Ensuring new housing delivers quality and mix of homes needed inc. AH, specialist needs and G&T	Policy addressed in Part 1	Considered strategic for SWLP
H1	Directing New Housing	Identifies locations for new housing growth and relevant criteria to assess appropriateness. Includes urban areas, allocated site, growth villages, limited infill villages, open countryside	Policy addressed in Part 1	Considered strategic for SWLP
H2	Affordable Housing	Developments of 11+ or floorspace of 1,000sq m requires 40% affordable housing Details of provision and viability considerations at planning application stage, range of defined criteria to be considered. Exceptional circumstances for off-site contributions.	Policy addressed in Part 1	Considered strategic for SWLP
H3	Affordable Housing on Rural Exception Sites	Permitted if satisfy a range of defined criteria	Policy addressed in Part 1	Considered strategic for SWLP
H4	Securing a Mix of Housing	Proposals required to include a mix of market housing that contributes towards a balance of house types and sizes across the district in accordance with latest SHMA. Range of defined circumstances to take into account	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
H5	Specialist Housing for Older People	Permissions granted where a range of defined criteria are met	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
H6	Houses in Multiple Accommodation and Student Accommodation	Permission only granted if a range of criteria are satisfied. Certain exceptions may apply	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
H7	Meeting the Accommodation Needs of Gypsies and Travellers	Council to produce DPD to allocate sufficient land to meet permanent accommodation needs of 31 pitches and a transit site of 6-8 pitches. Support WCC for one stopping place in north and one in south of the County to meet transit needs	Policy addressed in Part 1	Considered strategic for SWLP
H8	New Gypsy and Traveller Sites	Applications to be assessed against a range of defined criteria	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
H9	Compulsory Purchase of Land for Gypsy and Traveller Sites	Council to consider use of CPO powers to acquire sites for G&T if insufficient sites come forward by landowners	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
H10	Bringing Forward Allocated Sites in the Growth Villages	Allocated sites in Growth Villages permitted where the mix reflects up to date local housing need evidence. In the absence of or beyond the scheme should reflect the needs of the District.	Some elements addressed in Part 1, some elements saved for Part 2	While this is considered a non-strategic policy for SWLP, the definition of Growth Villages may be addressed in Part 1
H11	Limited Village Infill Housing Development in the Green Belt	Permitted in a limited infill village where a number of defined criteria are satisfied	Some elements addressed in Part 1, some elements saved for Part 2	While this is considered a non-strategic policy for SWLP, the definition of Limited Infill Villages may be addressed in Part 1
H12	Housing for Rural Workers	Permanent housing for rural workers in open countryside permitted where essential need to live permanently at or near place of work. Factors listed to be taken into account	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
H13	Replacement dwellings in the Open Countryside	Replacement dwelling should not be materially larger than existing dwelling and have no greater impact on character and openness of the rural area. Removal of pd rights will be considered.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
H14	Extensions to dwellings in the Open Countryside	Extensions to dwellings permitted unless result in disproportionate additions to original dwelling	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
H15	Custom and Self-built Housing Provision	Proposals are encouraged and will be approved in suitable, sustainable locations in compliance with other policies a) south of Coventry b) other major strategic housing sites c) brownfield sites in built-up areas d) growth villages and e) appropriate locations within infill villages NDPs encouraged to identify sites Council to produce SPD to assist in delivery	Policy addressed in Part 1	Considered strategic for SWLP
SC0	Sustainable Communities	New development to be high quality and enable strong communities to be formed and sustained, whilst protecting and enhancing historic, built and natural features. Set of defined criteria for new development	Policy addressed in Part 1	Considered strategic for SWLP
BE1	Layout and Design	New development permitted where it positively contributes to character and quality through good design. Set of defined criteria for new developments to satisfy.	Policy addressed in Part 1	Considered strategic for SWLP
BE2	Developing Significant Housing Sites	Sites over 200 dwellings or that have significant impact on character and appearance expected to comply with a development brief. Where absent applications should comply with BE1 and a set of defined criteria through a Layout and Design Statement	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
BE3	Amenity	Development not permitted if has an unacceptable adverse impact on amenity of nearby uses and residents and/or does not provide acceptable standards of amenity for future users and occupiers of the development	Policy addressed in Part 1	Considered strategic for SWLP
BE4	Converting Rural Buildings	Re-use and adaption of existing rural buildings permitted subject to a series of defined criteria	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
BE5	Broadband Infrastructure	Residential and employment developments encouraged to provide on-site infrastructure, including open access ducting to industry standards, to enable all premises and homes to be directly served by fibre optic broadband technology	Policy addressed in Part 1	Considered strategic for SWLP – will be covered in overarching infrastructure policy

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
BE6	Electronic Communications (Telecommunications and Broadband)	Support development of electronic communications networks with regard to a number of factors listed. New installation to demonstrate need. Development in or around sensitive locations should not significantly harm the location or assets, a number of exceptions are listed. Should be sited to minimise impact on external appearance	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TR1	Access and Choice	Development only permitted if provides safe, suitable and attractive access routes for a range of users listed. Development to demonstrate that they satisfy a range of criteria relating to highway safety, access, circulation, EV charging, disability needs.	Some elements addressed in Part 1, some elements saved for Part 2	Largely considered strategic for SWLP, although part d (EV charging facilities) is considered non-strategic
TR2	Traffic Generation	Large scale development that results in significant traffic movements should be supported by Transport Assessment and where necessary a Travel Plan. Development with significant negative impacts on health and wellbeing will not be permitted unless effective mitigation can be achieved. Development with significant negative impacts on air quality with AQMAs should be supported by an AQMP and where necessary a mitigation plan Transport Statement may be required for developments with relatively small transport implications. All measures to take account of cumulative impact of all development on traffic generation and air quality	Policy addressed in Part 1	Considered strategic for SWLP – will be covered in overarching infrastructure policy
TR3	Parking	Criteria for parking within new developments. Developments to also comply with parking standards in Parking SPD	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
TR4	Safeguarding for Transport Infrastructure	Development in areas safeguarded for HS2 and areas of search for park and ride will not be permitted where it could inhibit delivery of that infrastructure	Policy addressed in Part 1	Considered strategic for SWLP
TR5	Safe Operation of Aerodromes	Development within safeguarded areas will not be permitted which inhibits the safe operation of an officially safeguarded civil aerodrome	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
HS1	Healthy, Safe and Inclusive Communities	Potential for creating healthy, safe and inclusive communities to be taken into account in new developments. Range of considerations that support will be given for.	Policy addressed in Part 1	Considered strategic for SWLP
HS2	Protecting Open Space, Sport and Recreation Facilities	Loss of open spaces and sport and recreation facilities will not be permitted unless alternative of at least equivalence or assessment demonstrating lack of need. Development on open spaces for sport and recreation purposes permitted subject to proposal being of sufficient benefit to outweigh loss.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
HS3	Local Green Space	Support principle of designating Local Green Space and can be designated in NDPs	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
HS4	Improvements to Open Space, Sport and Recreation Facilities	Contributions sought to provide, improve and maintain facilities to meet local and district needs. Range of criteria to apply.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
HS5	Directing Open Space, Sport and Recreation Facilities	Support new and improved facilities, expected to demonstrate a range of defined aspects. Green Belt considered an appropriate location as long as preserves openness and does not conflict with purposes of including land within it	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
HS6	Creating Healthy Communities	Development permitted if address a range of listed requirements to deliver health benefits to the community	Policy addressed in Part 1	Considered strategic for SWLP – will be covered in overarching infrastructure policy
HS7	Crime Prevention	Layout and design encouraged to minimise potential for crime and anti-social behaviour and improve community safety. Developments to satisfy a range of listed criteria.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
HS8	Protecting Community Facilities	Loss of community facilities that serve local needs resisted unless a range of criteria are satisfied.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
CC1	Planning for Climate Change Adaptation	All development to be resilient to and adapt to climate change through inclusion of a range of listed measures where appropriate, inc. layout, use of GI, water efficiency and minimising vulnerability to flood risk	Policy addressed in Part 1	Considered strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
CC2	Planning for Renewable Energy and Low Carbon Generation	New low carbon and renewable energy technologies supported in principle subject to a range of listed criteria	Policy addressed in Part 1	Considered strategic for SWLP
CC3	Buildings Standards and other Sustainability Requirements	All non-residential development over 1,000 sq m to achieve BREAAAM 'very good' unless financially unviable. Applicants to consider potential for large scale decentralised district heating networks on strategic sites	Policy addressed in Part 1	Considered strategic for SWLP
FW1	Reducing Flood Risk	Applications to be submitted in line with meeting sequential and exception tests and NPPF requirements. Ensure developments are in line with a range of listed requirements. If adjacent a watercourse a Water Framework Directive assessment required to demonstrate how waterbody will be enhanced	Policy addressed in Part 1	Considered strategic for SWLP
FW2	Sustainable Drainage	Major developments to include SuDS outside of floodplain, presumption against underground storage of water. Developments to discharge at QBAR greenfield run-off rate	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
FW3	Water Efficiency	Developments of 1+ dwelling to meet a water efficiency standard of 110 litres/person/day.	Policy addressed in Part 1	Considered strategic for SWLP
FW4	Water Supply	Development to ensure adequate water supply to serve existing and proposed development.	Policy addressed in Part 1	Considered strategic for SWLP
HE1	Designated Heritage Assets and their Setting	Development not permitted if leads to substantial harm or total loss of the significance of a designated heritage asset unless necessary to achieve substantial public benefits that outweigh harm or loss or that meet a range of listed criteria.	Some elements addressed in Part 1, some elements saved for Part 2	The overall protection of heritage assets is considered strategic for SWLP; details of how this is achieved is considered non-strategic.
HE2	Conservation Areas	Presumption in favour of retention of unlisted buildings that make a positive contribution to character and appearance of a conservation area. Consent for demolition of unlisted buildings only granted if replacement will preserve or enhance character or appearance of conservation area.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
		Measures taken to restore or bring back into use areas that make a negative contribution to conservation areas		
HE3	Locally Listed Historic Assets	Demolition or loss of significance of a locally listed historic asset will be assessed in relation to scale of harm or loss and the significance of the asset. Change to use traditional detailing and materials	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
HE4	Archaeology	Development not permitted if results in substantial harm to Scheduled Monuments or other archaeological remains of national importance, and their settings unless wholly exceptional circumstances Presumption for preservation of locally and regionally important sites unless benefits outweigh harm. Any remains of archaeological value to be properly evaluated prior to planning permission being granted. Agreed programme of investigation and recording where adverse effect from development.	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
NE1	Green Infrastructure	Protect, enhance and restore GI assets and strive for integrated network. Natural environment to be planned for at a variety of spatial scales, recognising WCC Gi Strategy and Council to work with partners.	Policy addressed in Part 1	Considered strategic for SWLP
NE2	Protecting Designated Biodiversity and Geodiversity Assets	Protect designated areas and species of national and local importance for biodiversity and geodiversity, varying levels of protection depending on whether national or local designation.	Policy addressed in Part 1	Considered strategic for SWLP
NE3	Biodiversity	Development permitted if protects, enhances and/or restores habitat biodiversity, with range of criteria listed to adhere to.	Policy addressed in Part 1	Considered strategic for SWLP
NE4	Landscape	Development permitted if positively contributes to landscape character, range of listed criteria to be demonstrated	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP

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Policy ref	Policy name	Key aspects of policy	Proposed action	Notes
NE5	Protection of Natural Resources	Development permitted if ensures that natural resources remain safe, protected and prudently used. Range of listed criteria to be demonstrated.	Policy addressed in Part 1	Considered strategic for SWLP
NE6	High Speed Rail 2 (HS2)	When considering approval requests for HS2, appropriate mitigation and any significant environmental effects of HS2 on the natural environment, businesses and residents will be sought	Policy saved, to be addressed in Part 2	Considered non-strategic for SWLP
NE7	Use of Waterways	Waterways can be tools in place making and place shaping. Range of listed criteria that development should not incorporate.	Policy addressed in Part 1	Considered strategic for SWLP
DM1	Infrastructure Contributions	Development to provide or contribute towards provision of measures to directly mitigate impact and physical, social and GI to support the needs associated with the development To be provided in a timely manner Contributions may be on-site and off-site and/or investments, scale to be related to form of development and potential impact including cumulative impact Planning Obligations and CIL will contribute towards strategic infrastructure required to support the overall development in the Plan	Policy addressed in Part 1	Considered strategic for SWLP
DM2	Assessing Viability	Developments to comply with policies in Plan unless will result in development being unviable. Must be accompanied by Viability Assessment to be independently reviewed	Policy addressed in Part 1	Considered strategic for SWLP

Topic Areas not covered in either existing plan

Table 22: Policy areas for potential inclusion in the Part 1 plan, which are not covered by existing policy in either current plan.

Policy topic area	Proposed action	Notes	Hyperlink to relevant section in this document
Green and Blue Corridors	Potential inclusion in Part 1	Considered strategic for SWLP	Issue S1: Green and Blue Corridors
Green Economy	Potential inclusion in Part 1	Considered strategic for SWLP	Issue E1: Green Economy
Core opportunity area	Potential inclusion in Part 1	Considered strategic for SWLP	Issue E6: Core Opportunity Area
Housing Space Standards	Inclusion in Part 1	Considered strategic for SWLP	Issue H5: Housing Space Standards
Carbon sequestration	Inclusion in Part 1	Considered strategic for SWLP	Issue C3: Carbon Sequestration
Net Zero Carbon Buildings	Inclusion in Part 1	Considered strategic for SWLP	Net Zero Carbon Buildings
Climate Responsive Development Design	Inclusion in Part 1	Considered strategic for SWLP	Climate Responsive Development Design
Health Impact Assessments for major development	Potential inclusion in Part 1	Considered strategic for SWLP	Issue W2: Health Impact Assessments for major development
20-minute neighbourhoods	Inclusion in Part 1	Considered strategic for SWLP	Issue T1: 20-minute neighbourhoods
Smart cities	Inclusion in Part 1	Considered strategic for SWLP	Issue T4: Smart Cities
Environmental Net Gain	Potential inclusion in Part 1	Considered strategic for SWLP	Issue B5: Environmental Net Gain
Wildbelt designations	Potential inclusion in Part 1	Considered strategic for SWLP	Issue B6: Wildbelt designations

Issue P2: Equality and Inclusivity

Paragraph 130 (f) of the NPPF requires that we create places that are inclusive and accessible, and which promote community cohesion and resilience. A number of policy areas covered in this document – including ‘Housing’, ‘Transport’ and ‘Energy’ – will specifically tackle issues with direct relationships with inclusivity and equality such as (but not restricted to) access to appropriate housing which is affordable, access to and choice of an appropriate range of public transport, facilities and services to meet needs, and measures to tackle fuel poverty. Some issues are known to have a disproportionate impact on areas that have a high level of deprivation – for example, air quality issues relating to transport. Consideration of equalities and inclusivity should be woven through all the policies within the plan, with particular attention to areas of known or potential inequality.

An ‘Equalities Impact Assessment’ will form part of the evidence base for the SWLP, which will indicate if there are equalities issues resulting from the proposed policy content. In addition to this, it is useful to draw on the expertise of stakeholders to identify areas where further attention is needed regarding equality and inclusivity. This might influence the selection of policy options, or indicate new policy areas not currently considered.

Q-P2.1: Are there any areas where equality and inclusivity in planning needs further attention? Y/N/DK

Q-P2.2: If yes, please give further details

13. Glossary

Word	Definition
Accessibility	The ability of people to move around an area and reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping.
Active travel	Transport of people or goods, through non-motorised means, based around human physical activity.
Affordable housing	Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions for it to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency. Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as “low-cost market” housing, may not be considered as affordable housing for planning purposes.
AONB	An Area of Outstanding Natural Beauty (AONB) is an area of countryside in England, Wales, and Northern Ireland, that has been designated for conservation due to its significant landscape value.
Biodiversity	The variety of life on earth. It encompasses the whole of the natural world and all living things including plants, animals, and other organisms which, together, interact in complex ways with the inanimate environment to create living ecosystems.
Biodiversity Offsetting	Biodiversity offsetting involves activities to create biodiversity benefits in order to compensate for biodiversity losses resulting from development. This is to ensure that when a development damages nature in a way that is unavoidable or cannot be mitigated, new nature sites will be created to offset the negative impact on biodiversity.
Blue Infrastructure	Infrastructure involving water, for example canals, ponds, wetlands, streams, rivers.
Brownfield Land	Land which is or was occupied by a permanent structure, excluding agricultural buildings. Also known as previously developed land.
Carbon sequestration	a natural or artificial process by which carbon dioxide is removed from the atmosphere and held in solid or liquid form.
Call for Sites	A period of time where landowners are encouraged to come forward with sites they are interested in developing.
CIL	The Community Infrastructure Levy (CIL) is a charge that local authorities can set on new development in order to raise funds to help fund the infrastructure, facilities and services - such as schools or transport improvements - needed to support new homes and businesses.

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Climate Change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20 th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Climate Change Adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects (including from changes in rainfall and rising temperatures) which moderate harm or exploit beneficial opportunities.
Climate Change Mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Connectivity	The state of being connected or interconnected. In planning, connectivity can refer to road, rail, cycle and walking networks; digital connectivity; social connectivity; and the connectivity of green infrastructure.
Cotswold National Landscape/Cotswold Area of Outstanding Natural Beauty	The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty that has been designated for conservation due to its significant landscape value.
Decarbonisation	The process of removing or reducing the carbon dioxide (CO ₂) output of a country's economy. This is usually done by decreasing the amount of CO ₂ emitted across the active industries within that economy.
Delivery and Viability Studies	Assessment to determine that the contents of the Plan and its development strategies can be achieved.
Demographics	Statistical data relating to the population and particular groups within it.
Densification	Densification in terms of housing is a transformative process indicated by maximum land use and high-rise multi-family housing within the subdivisions, encouraged by the housing shortage and accelerated by the land supply restrictions that characterized the last twenty years, careless of the implications of such a pattern of development on the spatial and social structure balance affecting urban quality and sustainability.
Development Plan	A development plan is an aspect of town and country planning in the United Kingdom comprising a set of documents that set out the local authority's policies and proposals for the development and use of land in their area.
Energy Hierarchy	The Energy Hierarchy is a classification of energy options that prioritises a sustainable approach. The top of the energy hierarchy aims to reduce the need for energy, and the bottom falls back on using conventional fossil fuels. The middle tiers look at using renewable energy sources and being efficient with the energy created to reduce waste.
Equalities Impact Assessment (EQIA)	An assessment to ensure that strategies and policies contribute towards eliminating discrimination, promoting equality and fostering good relations.
Full lifetime of a development	Residential development should be considered for a minimum of 100 years, unless there is specific justification for considering a shorter period.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Green Corridors	A 'green corridor' (also known as wildlife corridor, biological corridor or habitat corridor) is a strip of land that is established to enable the bridging of habitat populations that have been split by human development such as a road, settlement or other human activity.
Green Belt	The Green Belt is an area of open land around a city, on which building is restricted.
HEDNA	The Housing and Economic Development Needs Assessment (HEDNA) looks at a wealth of evidence, including population, household and economic growth projections, to assess the need for housing and employment land.
Health Impact Assessment (HIA)	An assessment that puts people and their health at the heart of the planning process. It is used to identify and optimise the health and wellbeing impacts of plans.
Housing Strategy	Document detailing how Councils and their partners plan to work together to ensure that more people get the opportunity to live independently in good quality housing of their choice.
Infrastructure	The network of essential physical services that most buildings or activities are connected to. It includes not only physical services in an area (eg. Gas, electricity and water provision,

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	telecommunications, sewerage) and networks of roads, public transport routes, footpaths etc. but also community facilities and green infrastructure. New or improved infrastructure will generally need to be provided where significant levels of new development are proposed.
Industrial Strategy	A document that looks at the strengths and weaknesses of the local economy and sets out a plan of action to build on existing successes, and to develop and support areas that may be struggling.
Landscape Character Assessment	An assessment undertaken to help identify various landscape types with a distinct character that is based on a recognisable pattern of elements, including combinations of geology, landform, soils, vegetation, land use and human settlement.
Local Nature Recovery Strategies	Local Nature Recovery Strategies are a new system of spatial strategies for nature, which will cover the whole of England.
Local Plan	The plan for the future development of the local area, drawn up by the Local Planning Authority in consultation with the community. In law this is prescribed as a Development Plan Document adopted under the Planning and Compulsory Purchase Act 2004.
Local Wildlife Sites	Non-statutory areas of local importance for nature conservation that complement nationally and internationally designated geological and wildlife sites.
Neighbourhood Plan	A plan prepared by Parish/Town Councils or Neighbourhood Forums to establish general planning policies for the development and use of land within a particular neighbourhood area. Subject to conformity with the strategic policies of the Local Plan, an independent examination and support in a community referendum, a Neighbourhood Plan will become part of the planning framework for land uses in the local area.
Net Zero	The point at which the amount of greenhouse gases being put into the atmosphere by human activity in the UK equals the amount of greenhouse gases that is being taken out of the atmosphere. Source: Powering our Net Zero Future. Energy White Paper. Department for Business, Energy and Industrial Strategy. HM Government, Dec. 2020
Net Zero Carbon	Having Net Zero Carbon dioxide emissions, either by balancing carbon dioxide emissions with removal, or simply eliminating carbon dioxide emissions altogether
New Settlements	New settlements are new, large- scale developments, consisting of one or several subdivision projects planned to provide housing, work places and related facilities within a more or less self - contained environment.
Renewable Energy	Renewable Energy Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.
Resilience	The capacity of people and places to plan for, better protect, respond to and to recover from flooding and coastal change [or other impacts of climate change]. Source: National Flood and Coastal Erosion Risk Management Strategy for England. Environment Agency, Jul. 2020
S106 contributions	Developer contributions, often known as ‘S106 contributions’, are paid by developers to mitigate the impact of new homes and other buildings, which create extra demands on local facilities.
Self and Custom build housing	“Self-build” refers to projects where individuals or groups directly organise the design and construction of new homes. Custom housebuilding involves individuals or groups working with a specialist developer to deliver new homes that meet their specific aspirations and needs
Settlement Design Analysis	A form of analysis that looks at the structure and design of existing settlements to help identify where growth might best be integrated
Severance	The term applied to the effects that roads and their traffic can have on social interaction. In particular it relates to the imposition of barriers that deter people’s movements.

Sites of Special Scientific Interest (SSSI)	Specifically defined sites or areas designated as being of national importance because of their wildlife, plants or flowering species and/or their unusual or atypical geological features. SSSIs are designated by Natural England and have protected status under the Wildlife and Countryside Act 1981. The protection is subject to Government Regulations.
Social Isolation	Social isolation can be defined structurally as the absence of social interactions, contacts, and relationships with family and friends, with neighbours on an individual level, and with “society at large” on a broader level.
Soundness	To be considered sound, a Development Plan Document must meet four tests, it must be positively prepared, justified (have a robust and credible evidence base and be the most appropriate strategy) as well as effective (deliverable, flexible and able to be monitored) and consistent with national policy.
Specialist Housing	Specialised accommodation for any age group that is purpose designed and designated in a planning obligation for a specific client group. The delivery of support or care will not result in the categorisation of housing as specialised if it is not purpose designed and designated.
Standard Method	The standard method is a government formula used to determine the minimum number of homes anticipated to be planned for, in a way which addresses projected house growth and historic under-supply. The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure.
Strategic Flood Risk Assessment (SFRA)	A high-level assessment of flood risk carried out by or for Local Planning Authorities with the purpose of assisting them to deliver sustainable development and to avoid development in areas that are at risk of flooding or that would increase flooding elsewhere.
Sustainability Appraisal	The Planning and Compulsory Purchase Act 2004 requires Local Development Documents (LDDs) to be prepared with a view to contributing to the achievement of sustainable development. Sustainability appraisal is a systematic process that assesses the social, environmental and economic effects of the strategies and policies in a LDP from the outset of the preparation process. This helps to ensure that decisions are made that accord with sustainable development requirements.
Sustainable Urban Drainage Systems (SuDS)	The SuDS approach involves slowing down and reducing the quantity of surface water run off for a developed area to manage flood risk downstream, and reduce the risk of run off causing pollution. This is achieved by harvesting, infiltrating, slowing, storing, conveying and treating run off on site. SuDS allow water to become a more visible and tangible part of the built environment, which can be enjoyed by everyone.
Transport Assessment	A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and what measures will need to be taken to deal with the anticipated transport impacts of the development.
Urban Capacity Study	An urban capacity study identifies sites which may have the potential to come forward for residential development within existing urban areas, to assist in limiting the number of dwellings which would need to be developed on greenfield sites in the open countryside.
Water Cycle Strategy	Document identifying the water services (incl. supply, and waste) required to support the development within the Plan. It establishes where any constraints exist and identifies measures to eliminate or mitigate these constraints.
Wellbeing	The state of being comfortable, healthy, or happy
Zero-carbon	Where no carbon emissions are being produced from a product/service

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